

EXHIBIT “D”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NO. 2:15-CV-00571-GJP

EMIL and SHARON CLOUD,)	DEPOSITION UPON
)	
Plaintiffs,)	ORAL EXAMINATION
)	
- vs -)	OF
)	
ELECTROLUX HOME PRODUCTS,)	MICHAEL STODDARD,
INC.,)	JR., CFI
)	
Defendant.)	
- - - - -)	

TRANSCRIPT OF DEPOSITION, taken by and
before DANIELLE N. COUGHLIN, Registered Professional
Reporter and Notary Public, at the offices of DE
LUCA LEVINE, LLC, Three Valley Square, 512 East
Township Line Road, Suite 220, Blue Bell,
Pennsylvania, on Thursday, April 28, 2016,
commencing at 12:05 p.m.

ERSA COURT REPORTERS
30 South 17th Street
United Plaza - Suite 1520
Philadelphia, PA 19103
(215) 564-1233

MICHAEL STODDARD, JR., CFI

<div>2</div> <div>1 A P P E A R A N C E S:</div> <div>2</div> <div>3 DE LUCA LEVINE, LLC</div> <div>4 BY: PATRICK A. HUGHES, ESQUIRE</div> <div>5 Three Valley Square</div> <div>6 512 East Township Line Road, Suite 220</div> <div>7 Blue Bell, Pennsylvania 19422</div> <div>8 Attorneys for the Plaintiffs</div> <div>9</div> <div>10 NICHOLSON LAW GROUP</div> <div>11 BY: MELISSA L. YEMMA, ESQUIRE</div> <div>12 Rose Tree Corporate Center II</div> <div>13 1400 North Providence Road, Suite 6035</div> <div>14 Media, Pennsylvania 19063</div> <div>15 Attorneys for the Defendant</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div>	<div>4</div> <div>1 (By agreement of counsel, the</div> <div>2 sealing, filing, and certification of the</div> <div>3 transcript has been waived; and all</div> <div>4 objections, except as to the form of</div> <div>5 the question, have been reserved until</div> <div>6 the time of trial.)</div> <div>7</div> <div>8 MICHAEL STODDARD, JR., CFI</div> <div>9 after having been duly sworn, was</div> <div>10 examined and testified as follows:</div> <div>11</div> <div>12 BY MS. YEMMA:</div> <div>13 Q Good afternoon, Mr. Stoddard. My name is</div> <div>14 Melissa Yemma. I'm with Nicholson Law Group, and</div> <div>15 we're here today to take your deposition. Do you</div> <div>16 mind if I call you Mike?</div> <div>17 A That's fine.</div> <div>18 Q I know you've been deposed before, and</div> <div>19 you've heard the rules associated with a</div> <div>20 deposition. Do you need me to repeat those this</div> <div>21 afternoon?</div> <div>22 A No, that's fine. I understand how this</div> <div>23 works.</div> <div>24 Q Okay. If -- I don't want you to be</div>
<div>3</div> <div>1 I N D E X</div> <div>2</div> <div>3 WITNESS PAGE</div> <div>4 MICHAEL STODDARD, JR., CFI</div> <div>5 By: Ms. Yemma 4</div> <div>6</div> <div>7</div> <div>8</div> <div>9 E X H I B I T S</div> <div>10</div> <div>11</div> <div>12 Stoddard-1 Curriculum Vitae 7 198</div> <div>13 Stoddard-2 Curriculum Vitae 9 199</div> <div>14 Stoddard-3 Report 15 200</div> <div>15 Stoddard-4 Photographs 39 201</div> <div>16 Stoddard-5 Handwritten Notes 187 202</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div>	<div>5</div> <div>1 uncomfortable for any reason, so if you need to</div> <div>2 take a break or use the restroom, just let me know.</div> <div>3 Okay? Sound good?</div> <div>4 A Sure.</div> <div>5 Q And it looks like you brought a copy of</div> <div>6 your file with you today; is that correct?</div> <div>7 A I did, yeah. Most of the stuff is in</div> <div>8 hard copy, at least the file-specific stuff. I do</div> <div>9 have a thumb drive with some digital materials,</div> <div>10 photos and such, and then I also brought a copy of</div> <div>11 our dryer hard drive, as you're familiar with.</div> <div>12 Q Right.</div> <div>13 So -- and we had a discussion off the</div> <div>14 record before we got started. So our firm last</div> <div>15 deposed you in October of 2015; is -- do you recall</div> <div>16 that?</div> <div>17 A That sounds about right.</div> <div>18 Q And at that time, a hard drive was</div> <div>19 provided to us, so as you sit here today, do you</div> <div>20 know if there are any differences between what we</div> <div>21 were provided in October of 2015 with what -- with</div> <div>22 what you brought with you today?</div> <div>23 A The only minor differences would be the</div> <div>24 addition of probably some exemplar dryers, no -- we</div>

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<p style="text-align: right;">6</p> <p>1 have not done any testing or made any substantial</p> <p>2 changes to -- to the hard drive since then.</p> <p>3 Q Okay. So no testing since October of</p> <p>4 2015?</p> <p>5 A No physical testing, no.</p> <p>6 Q No physical testing.</p> <p>7 When you say photographs of exemplar</p> <p>8 dryers -- is that what you said?</p> <p>9 A Yes.</p> <p>10 Q Okay. Can you just explain what you mean</p> <p>11 by that? I think I know, but --</p> <p>12 A Sure.</p> <p>13 So if we obtain any -- any used dryers or</p> <p>14 even new dryers that have never been involved in a</p> <p>15 fire, we typically photo document those, and also</p> <p>16 even cases that we have ongoing other cases, those</p> <p>17 go into the library on what we call the hard drive,</p> <p>18 the dryer hard drive.</p> <p>19 So any of our other cases may have some</p> <p>20 additional photographs from those other unrelated</p> <p>21 to this specific matter, but they'll have -- it</p> <p>22 could be -- it might be Electrolux dryers, it could</p> <p>23 be Whirlpool, GE, just kind of whatever they are,</p> <p>24 but, again, they don't really have a lot of bearing</p>	<p style="text-align: right;">8</p> <p>1 A I have. I drafted it.</p> <p>2 Q Okay. And if you could identify it for</p> <p>3 the record.</p> <p>4 A Sure. It's my curriculum vitae.</p> <p>5 Q Okay. And does that -- does your</p> <p>6 curriculum vitae also include your testimony</p> <p>7 history?</p> <p>8 A It does. At the end, there's deposition</p> <p>9 and trial testimony.</p> <p>10 Q Okay. Starting on page 10; is that</p> <p>11 right?</p> <p>12 A Yes.</p> <p>13 Q And I believe this document marked as</p> <p>14 Stoddard-1 was provided to us either in January or</p> <p>15 February of this year. I'm not exactly sure, but</p> <p>16 do you know if there are any updates that need to</p> <p>17 be made to this document?</p> <p>18 A There are, yeah. I believe this document</p> <p>19 was probably produced the same time as my report,</p> <p>20 because I know it was one of the appendices. I do</p> <p>21 have a more current version of my CV with me.</p> <p>22 Q Okay. Do you -- is it in your file?</p> <p>23 A Yes.</p> <p>24 Q Do you mind pulling out a copy of it?</p>
<p style="text-align: right;">7</p> <p>1 specifically on this case. It's more of like a</p> <p>2 repository.</p> <p>3 Q Got it.</p> <p>4 Do you mind if I just put your file down,</p> <p>5 like, in front of me?</p> <p>6 A That's fine.</p> <p>7 Q Okay. Just so I can see. I'll look</p> <p>8 through it when we take the lunch break. I just</p> <p>9 wanted to see the tabs, if that's okay.</p> <p>10 And, like, I know you've done this many</p> <p>11 times before, but if for any reason you need to</p> <p>12 review something in your file to answer a question,</p> <p>13 you're absolutely free to do so. Sound good?</p> <p>14 A All right.</p> <p>15 MS. YEMMA: Let's mark that as</p> <p>16 Stoddard-1, so I'm going to hand you</p> <p>17 what's just been marked as Stoddard-1.</p> <p>18 (At this time, a document was</p> <p>19 marked for identification as Exhibit</p> <p>20 Stoddard-1.)</p> <p>21 BY MS. YEMMA:</p> <p>22 Q And for the record, it's a 13-page</p> <p>23 document, and, Mike, have you seen this document</p> <p>24 before?</p>	<p style="text-align: right;">9</p> <p>1 A Sure.</p> <p>2 Q And we'll mark that, too.</p> <p>3 Thanks. Can I mark this copy, Mike?</p> <p>4 A Yes.</p> <p>5 MS. YEMMA: And I'm sure Pat</p> <p>6 will make a copy for us.</p> <p>7 MR. HUGHES: Sure.</p> <p>8 (At this time, a document was</p> <p>9 marked for identification as Exhibit</p> <p>10 Stoddard-2.)</p> <p>11 BY MS. YEMMA:</p> <p>12 Q Okay. I'm going to hand you what's just</p> <p>13 been marked as Stoddard-2, and just a moment ago,</p> <p>14 you testified that that document we marked as</p> <p>15 Stoddard-2 is an up-to-date copy of your curriculum</p> <p>16 vitae and testimony history; is that right?</p> <p>17 A Yes.</p> <p>18 Q Okay. And it looks like there were two</p> <p>19 additional depositions that you had given?</p> <p>20 A Yes.</p> <p>21 Q Okay. Can you tell me -- I'm sorry,</p> <p>22 because we only have the one copy. Let's turn to</p> <p>23 page 12, if we can share.</p> <p>24 A We can do that. That's fine.</p>

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<p style="text-align: right;">10</p> <p>1 Q All right. Okay. So number -- it looks 2 like No. 22, which is Liberty Mutual as subrogee of 3 Linda and Nicholas Rowe versus Schneider Electric 4 IT Corporation? 5 A That's correct. 6 Q Okay. In that case, you gave a 7 deposition? 8 A I did. 9 Q And what party were you retained by? 10 A Plaintiff, Liberty Mutual. 11 Q And what -- was it a products case? 12 A It was, yes. 13 Q Can you -- do you recall the type of 14 product that was involved? 15 A Yes. It was a computer battery backup of 16 uninterruptible power supply. 17 Q Did a fire result? 18 A Yes. 19 Q And do you recall your opinions in that 20 case? 21 A Yes. 22 Q Okay. And what were they? 23 A Well, myself in conjunction with our 24 electrical engineer, we concluded that the APC is</p>	<p style="text-align: right;">12</p> <p>1 Q Right, right. 2 So, Mike, I quickly went through what we 3 marked as Stoddard-2, and it looked like there were 4 two updates to your deposition testimony history. 5 As you sit here, do you know what other 6 updates there are to your CV that are different 7 from Stoddard-1? 8 A I can just compare the two if you like. 9 The only updates would be maybe some training. 10 Q Okay. Do you -- do you mind? 11 A Not at all. 12 Q Okay. Thank you. 13 A No, the training list is the same. The 14 last course I took was in November of 2015. 15 Q Okay. So then the only updates would be 16 the two depositions that we just talked about? 17 A That's correct, the two depositions. 18 Q Okay. And your testimony history goes 19 back to October 4th of 2006, so are these -- is 20 this a list of all the depositions you've given in 21 your career? I'm looking at page 10. 22 A Yes. 23 Q Okay. And same question with regard to 24 your trial testimony on page 13. I see four</p>
<p style="text-align: right;">11</p> <p>1 the brand, caused the fire due to a manufacturing 2 and design defect. 3 Q Okay. And the case after that, No. 23 on 4 the list, April 19th, that's Allstate versus 5 Electrolux. Do you see that? 6 A Yes. 7 Q Okay. And you gave a deposition in that 8 case? 9 A I did. 10 Q And was -- it was a products case? 11 A Yes. 12 Q Was it involving a dryer fire? 13 A Yes. 14 Q Okay. And do you remember the name of 15 the homeowner in that case? 16 A Yes. It's Ecchivierra, E-C-C-H-I-V-I-E, 17 maybe R-R-A, something like that. 18 MS. YEMMA: Off the record. 19 (At this time, a discussion was 20 held off the record.) 21 BY MS. YEMMA: 22 Q I think that was probably right. 23 A I'd have to write it down to actually see 24 it.</p>	<p style="text-align: right;">13</p> <p>1 trials. Is that all of the trial testimony you've 2 given in your career? 3 A Yes. 4 Q I know that Ron Parsons is still at the 5 Wright Group. Is there anyone else that you 6 currently work with in terms of fire analysts or 7 any other engineers at the Wright Group? 8 A Yeah, we have other experts. 9 Q Okay. How many experts are at the Wright 10 Group currently? 11 A I'd say seven. We also have a retired 12 employee that still does work for us sometimes, so 13 I'm not really counting him, but full-time experts, 14 we have seven. 15 Q And I know you and Mr. Parsons signed the 16 report in this matter in the Cloud case. Did -- 17 did anyone else at the Wright Group assist you or 18 Mr. Parsons with preparation of the report in this 19 case? 20 A The report, no, no. That would have been 21 myself and Mr. Parsons. 22 Q Okay. How about in examining any of the 23 physical evidence? Did anyone else at the Wright 24 Group assist you or Ron with that?</p>

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<p style="text-align: right;">14</p> <p>1 A The physical evidence in this case, I was</p> <p>2 the person who did the actual examinations, both of</p> <p>3 the examinations.</p> <p>4 Q Okay. And I think there were -- there</p> <p>5 were three exams after the fire scene; is that</p> <p>6 correct? There was a -- and I'm counting three by</p> <p>7 the nondestructive and then the two destructive</p> <p>8 exams.</p> <p>9 A That's correct.</p> <p>10 Q Would you agree with that? And we'll</p> <p>11 talk about those in detail later.</p> <p>12 When were you first retained in this</p> <p>13 matter?</p> <p>14 A I'd have to look at my report, but I</p> <p>15 think it was sometime in early 2014.</p> <p>16 Q Okay. And this fire happened on December</p> <p>17 19th, 2013. Does that comport with your --</p> <p>18 A That sounds correct. If it's okay, can I</p> <p>19 just get out my report?</p> <p>20 Q I was just going to mark it, so let's do</p> <p>21 that next.</p> <p>22 A Yeah, that's fine.</p> <p>23 Q So, Mike, I printed out a copy of your</p> <p>24 report and also the appendices, 1 through 8, and</p>	<p style="text-align: right;">16</p> <p>1 matter specifically, were you given documents to</p> <p>2 review?</p> <p>3 A I was.</p> <p>4 Q Okay. And what were you given to review?</p> <p>5 And if you -- if it's easier just to refer to a</p> <p>6 section in your report.</p> <p>7 A Sure. Appendix 1 lists all the documents</p> <p>8 I reviewed specifically in this case, as well as,</p> <p>9 you know, general information we rely upon.</p> <p>10 Q Okay. And does your report accurately</p> <p>11 reflect all of your opinions in connection with</p> <p>12 this matter?</p> <p>13 A It should at least touch on every opinion</p> <p>14 we have. Obviously it's a pretty lengthy report,</p> <p>15 so we have a lot of information in there. If</p> <p>16 there's an opinion I haven't formulated or you ask</p> <p>17 me today, then obviously I reserve the right to</p> <p>18 clarify that.</p> <p>19 Q Of course.</p> <p>20 A But certainly we do the best of our</p> <p>21 ability to include all of our opinions.</p> <p>22 Q So since you -- what is the date of your</p> <p>23 report?</p> <p>24 A January 20, 2016.</p>
<p style="text-align: right;">15</p> <p>1 the appendices, that's all part of your report,</p> <p>2 right?</p> <p>3 A Yes.</p> <p>4 Q So we'll just mark all that collectively</p> <p>5 as Stoddard-3. So the report is stapled, and the</p> <p>6 appendices just have a rubber band.</p> <p>7 (At this time, a document was</p> <p>8 marked for identification as Exhibit</p> <p>9 Stoddard-3.)</p> <p>10 THE WITNESS: So just to</p> <p>11 clarify, the date we received the</p> <p>12 assignment was February 24, 2014.</p> <p>13 BY MS. YEMMA:</p> <p>14 Q February 24th, 2014?</p> <p>15 A Yeah, and the date of the fire, according</p> <p>16 to my information, was December 19, 2013.</p> <p>17 Q Okay. And what's the understanding of</p> <p>18 your role in this case?</p> <p>19 A I was asked to -- to do an evidence exam</p> <p>20 and to assess the product for the cause of the fire</p> <p>21 and address its involvement in the cause of the</p> <p>22 fire.</p> <p>23 Q And I know you've worked on other</p> <p>24 Electrolux dryer cases, but in connection with this</p>	<p style="text-align: right;">17</p> <p>1 Q Now, since you've issued that report, my</p> <p>2 experts have issued their reports. Have you had a</p> <p>3 chance to review them, and specifically the reports</p> <p>4 of Jim Crabtree and Dr. Purswell?</p> <p>5 A I have, Crabtree's more so than Dr.</p> <p>6 Purswell's, just for my role, anyway.</p> <p>7 Q Sure.</p> <p>8 And with -- are there any opinions that</p> <p>9 you have in this matter that aren't contained in</p> <p>10 your report?</p> <p>11 A Again, I mean, I think I've put just</p> <p>12 about everything in the report, but if there's</p> <p>13 something that comes up, then we'll talk about it</p> <p>14 today hopefully.</p> <p>15 Q Okay. All right. In connection with</p> <p>16 this matter, have you had any conversations with</p> <p>17 Dr. Vigilante?</p> <p>18 A I believe I have. I've talked to Mr. --</p> <p>19 Dr. Vigilante numerous occasions on different</p> <p>20 cases, so it's hard to say what case and what</p> <p>21 conversation, but I'm pretty certain I've had</p> <p>22 conversations with him.</p> <p>23 Q In connection with this case?</p> <p>24 A Yes.</p>

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<p style="text-align: right;">18</p> <p>1 Q Okay. Do you have, as you sit here, any 2 recollection of those -- a specific recollection of 3 the conversation in terms of what was discussed? 4 A Just providing information about the 5 actual appliance itself, because he's always 6 concerned about the locations of the warnings and 7 the structures of the warnings on this appliance 8 versus the other ones that are manufactured. 9 So using an example like the laundry 10 center has a different warning than the 11 freestanding dryer does, so he wants to know, what 12 is it, where is it, and I think I provide some 13 measurements in at least one of the cases, anyway. 14 Q How have you communicated with Dr. 15 Vigilante? By email or phone, or has he come to 16 the Wright Group? 17 A Primarily by telephone and possibly some 18 emails, but -- but definitely primarily by 19 telephone. 20 Q Have you met in person? 21 A I believe I've met him once, but I don't 22 know if he's ever been to our office. If he has, 23 it was on another case on another matter. 24 Q Okay. And John Frey, who was also</p>	<p style="text-align: right;">20</p> <p>1 Absolutely. 2 A Since we have this deposition today and 3 another tomorrow, I had to prepare for both, and I 4 also don't want to make any confusion here. 5 I do not see Mr. Buckley's photographs on 6 my list. I know I've seen scene photographs, but 7 I'm not sure who they were from, if it was Mr. 8 Buckley's scene photographs or Electrolux's expert. 9 I can't remember his name off the top of my head, 10 but whoever it was from EFI that was there. 11 Q Okay. And I understand from reviewing 12 your report that you had the occasion to speak with 13 Mr. and Mrs. Cloud; is that correct? 14 A I have, yeah. We did an interview of Mr. 15 and Mrs. Cloud over the phone. 16 Q Was that before their depositions were 17 taken in this case? 18 A It was. 19 Q Have you spoken with anyone else, not 20 including counsel, regarding this case that we 21 haven't already talked about? 22 A As far as case specifics, no. I mean, I 23 talk to people about Electrolux dryer fires all the 24 time, but -- but not specifically regarding the</p>
<p style="text-align: right;">19</p> <p>1 identified by the plaintiffs as an expert in this 2 case, have you had any conversations with him 3 about -- 4 MR. HUGHES: We're in the Cloud 5 case, and I was getting confused. That's 6 Bob Buckley. John Frey is in Vitale. 7 MS. YEMMA: I am sorry. 8 (At this time, a discussion was 9 held off the record.) 10 BY MS. YEMMA: 11 Q Bob Buckley, he's been identified as an 12 expert by the plaintiffs in this case. Have you 13 had any conversations with Mr. Buckley? 14 A I don't recall if I have or not. I think 15 I -- I think I may have. I just don't recall 16 specifics of the conversation. 17 Q Okay. Did -- have you reviewed Mr. 18 Buckley's report? 19 A I have. 20 Q And have you reviewed his photographs 21 from the fire scene? 22 A I don't know if I've actually seen his 23 photographs of the fire scene. Let me double-check 24 my appendix.</p>	<p style="text-align: right;">21</p> <p>1 Cloud matter. 2 Q And since you just mentioned generally 3 speaking, have you had any conversations with John 4 Fallows regarding Electrolux dryer fires in the 5 last five years, let's say? 6 A It's Joe Fallows. 7 Q I'm sorry. Joe. 8 A Yes, I -- 9 Q Joe Fallows. 10 A I've spoken with Mr. Fallows a number of 11 times. 12 Q When was the last time you spoke with Mr. 13 Fallows? 14 A Sometime last week. 15 Q Have -- what was that conversation about? 16 A He was looking for a specific document 17 was the last time I talked to him, some type of 18 report or test or something, I think. 19 Q Related to Electrolux dryer fires? 20 A No. Well, I mean, yes, in a way. I 21 think more on generally -- general fire containment 22 of dryer fires. 23 Q Did you provide that document to him? 24 A I did.</p>

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<p style="text-align: right;">22</p> <p>1 Q Do you remember as you sit here what the</p> <p>2 document was?</p> <p>3 A It was a test report regarding UL 2158</p> <p>4 and the fire containment testing.</p> <p>5 Q Have you done any testing with Mr.</p> <p>6 Fallows on Electrolux dryer fires -- or Electrolux</p> <p>7 dryers?</p> <p>8 A We did testing that was done with the</p> <p>9 assistance of Mr. Fallows, at least as far as</p> <p>10 discussing some of the protocols and things, I</p> <p>11 think, but I don't think he was actually there when</p> <p>12 we conducted the testing. I know I've shared</p> <p>13 results of our testing with Mr. Fallows.</p> <p>14 Q So, Mike, what -- what testing are you</p> <p>15 specifically referring to?</p> <p>16 A Testing we did back in -- I want to say</p> <p>17 it was in 2014, in that area, regarding the</p> <p>18 flammability of plastic components from clothes</p> <p>19 dryers, not just Electrolux, but other -- other</p> <p>20 materials, and also our own fire containment</p> <p>21 testing.</p> <p>22 Q So I'm looking in your report on page</p> <p>23 160. There was -- you did component burn testing</p> <p>24 in October of 2013, and I'll wait until you get</p>	<p style="text-align: right;">24</p> <p>1 burn testing and then the fire containment both in</p> <p>2 October 2013, were the last -- last tests that the</p> <p>3 Wright Group performed on Electrolux dryers. Is</p> <p>4 that right, or has there been testing since then?</p> <p>5 A Well, I mean, we're -- we are doing</p> <p>6 case-specific testing on, like, ventilation</p> <p>7 components and things like that, but as far as</p> <p>8 general overall testing that would be applicable,</p> <p>9 you know, universally across the cases, I would say</p> <p>10 that's the last significant testing we've done.</p> <p>11 Q As you sit here, do you have any plans to</p> <p>12 do any general testing on Electrolux dryers in the</p> <p>13 future?</p> <p>14 A Nothing -- nothing firm, no. It's</p> <p>15 certainly possible, though. We don't have anything</p> <p>16 planned.</p> <p>17 Q I asked you a few minutes ago about your</p> <p>18 communications with Mr. and Mrs. Cloud. How did</p> <p>19 you -- did you speak to them over the phone?</p> <p>20 A Someone in our company did. I'm not sure</p> <p>21 if I did or not.</p> <p>22 Q And I should have asked you that</p> <p>23 question. I made the assumption that you did. So</p> <p>24 as you sit here today, do you know whether you had</p>
<p style="text-align: right;">23</p> <p>1 there. Sorry.</p> <p>2 A I'm sorry. What page was that?</p> <p>3 Q 160.</p> <p>4 A Yes.</p> <p>5 Q Okay. So is that the testing you were</p> <p>6 just referring to?</p> <p>7 A That was some of the testing, yes, and</p> <p>8 then the following section, which is the fire</p> <p>9 containment testing from October 2013 listed on</p> <p>10 page 163.</p> <p>11 Q Is there any other testing that you've</p> <p>12 spoken to Mr. Fallows about with regard to</p> <p>13 Electrolux dryers, that you can recall?</p> <p>14 A Again, testing by people that --</p> <p>15 others -- others have done, but not testing that we</p> <p>16 have physically performed ourselves, at least not</p> <p>17 in regards to Electrolux dryers.</p> <p>18 We've been involved in other cases with</p> <p>19 Mr. Fallows as well where we've had other</p> <p>20 conversations about it, but I don't specifically</p> <p>21 recall anything specifically about Electrolux</p> <p>22 dryers other than those two main tests.</p> <p>23 Q In reviewing your report, it looks like</p> <p>24 the two tests we were talking about, the component</p>	<p style="text-align: right;">25</p> <p>1 the conversation or someone else did?</p> <p>2 A I don't, but I may be able to find that</p> <p>3 by looking in my file.</p> <p>4 Q If you could. Thanks.</p> <p>5 A I did not do the interview. It was done</p> <p>6 by Anthony D'Addario -- that's</p> <p>7 D-apostrophe-A-D-D-A-R-I-O -- who was a former</p> <p>8 employee of the Wright Group.</p> <p>9 Q Okay. When he was with the Wright Group,</p> <p>10 what was his position back when these interviews</p> <p>11 were done in April of 2014?</p> <p>12 A He was a fire</p> <p>13 investigator-in-training/lab technician. He was --</p> <p>14 he was out of -- recently out of college, and he</p> <p>15 left to go back -- well, left to start a career</p> <p>16 with the fire service.</p> <p>17 Q Okay. And were you present when Anthony</p> <p>18 was having the conversation with the Clouds?</p> <p>19 A Not likely. I did sit in on some of his</p> <p>20 interviews, so it's possible I could have been.</p> <p>21 That was during the time where I was kind of</p> <p>22 training him to do interviews, so it's possible,</p> <p>23 but I know he did quite a few on his own as well.</p> <p>24 Q And was the telephone interview recorded</p>

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<p style="text-align: right;">26</p> <p>1 in any way?</p> <p>2 A No. That's not our practice to record</p> <p>3 interviews, generally.</p> <p>4 Q How -- well, strike that.</p> <p>5 Did -- do you know whether Anthony took</p> <p>6 notes during the conversation?</p> <p>7 A Yes.</p> <p>8 Q Okay. Do you have a copy in your file?</p> <p>9 A I do.</p> <p>10 Q Okay. And is -- are they in the folder</p> <p>11 that you have in front of you?</p> <p>12 A I do. It's the folder listed Interview</p> <p>13 Notes.</p> <p>14 Q Okay. Got it. All right. I'll take a</p> <p>15 look at those later.</p> <p>16 Did Anthony follow any type of a script</p> <p>17 when speaking with the Clouds, that you're aware</p> <p>18 of?</p> <p>19 A We have a general interview</p> <p>20 questionnaire, and he would have generally followed</p> <p>21 that. If there was any specific questions that he</p> <p>22 felt was necessary for that situation, he would</p> <p>23 have asked them.</p> <p>24 Q Okay. So since Anthony is no longer at</p>	<p style="text-align: right;">28</p> <p>1 exam, but we did not do any type of airflow</p> <p>2 testing.</p> <p>3 Q Have you tried to create exemplar venting</p> <p>4 similar to what was at the Clouds' house at the</p> <p>5 time of the fire?</p> <p>6 A Specifically to the Clouds, no, we didn't</p> <p>7 attempt to recreate that.</p> <p>8 Q Okay.</p> <p>9 A We have done extensive testing on</p> <p>10 exemplar venting, which allows me to make certain</p> <p>11 opinions about that certainly, but -- but nothing</p> <p>12 to specifically mimic or duplicate the Cloud</p> <p>13 arrangement.</p> <p>14 Q Do you have an opinion as to what the</p> <p>15 back pressure would have been for the Clouds' dryer</p> <p>16 at the time of installation?</p> <p>17 A I -- I don't. The dryer was installed</p> <p>18 about six years before the fire, so whatever</p> <p>19 condition it was at the time of the fire was most</p> <p>20 likely not the same condition it was as it was</p> <p>21 installed.</p> <p>22 Q Okay. Do you -- do you have any opinions</p> <p>23 as to what the back pressure would have been at any</p> <p>24 point while the dryer was in use at the Clouds'</p>
<p style="text-align: right;">27</p> <p>1 the Wright Group, the section of the report that</p> <p>2 starts Interviews on page 7, did you prepare that</p> <p>3 portion of the report that describes the interview?</p> <p>4 A I did. I was the person who wrote that</p> <p>5 in the report, but I used Anthony's notes to</p> <p>6 compile that information.</p> <p>7 Q Okay. So going back to a few minutes</p> <p>8 ago, we were talking about testing in general, and</p> <p>9 I wanted to ask you about case-specific testing.</p> <p>10 Have you done any case-specific testing for the</p> <p>11 Cloud matter?</p> <p>12 A No physical testing, just cognitive</p> <p>13 testing, thinking about the elements at issue, and</p> <p>14 dealing with that in the general sense, but no</p> <p>15 physical testing of anything.</p> <p>16 Q I missed -- did you say cognitive</p> <p>17 testing?</p> <p>18 A I did.</p> <p>19 Q And I know in some cases that you or the</p> <p>20 Wright Group have attempted to reconstruct the</p> <p>21 venting for dryers. Did you make any attempt in</p> <p>22 this case to reconstruct the venting for the</p> <p>23 Clouds' dryer?</p> <p>24 A We reconstructed in the lab during the</p>	<p style="text-align: right;">29</p> <p>1 house?</p> <p>2 A Nothing specifically. I mean, I could</p> <p>3 probably estimate a general range. I don't think</p> <p>4 it was more than one inch of water column, but,</p> <p>5 again, even post-fire, there was movement of -- of</p> <p>6 the lint and other items that were in the venting</p> <p>7 that makes it very difficult to come up with any</p> <p>8 estimate that's extremely detailed or accurate.</p> <p>9 Q So when you say not more than one inch,</p> <p>10 what are you basing that on?</p> <p>11 A Based upon other testing we've done, and</p> <p>12 even -- even when you have a venting that has some</p> <p>13 accumulation of lint or even a pretty significant</p> <p>14 blockage of lint, there's still air that is passing</p> <p>15 through that, and that's been, you know, through --</p> <p>16 again through exemplar tests that we've done and</p> <p>17 through testing we've done in other cases.</p> <p>18 Q And, Mike, I don't think I asked you this</p> <p>19 before, but just to confirm, you weren't at the</p> <p>20 fire scene inspection; is that right?</p> <p>21 A That's correct.</p> <p>22 Q Okay. You've never been to the Clouds'</p> <p>23 house?</p> <p>24 A No.</p>

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<p style="text-align: right;">30</p> <p>1 Q Okay. So the Wright Group -- well, when</p> <p>2 did the Wright Group receive the evidence from the</p> <p>3 Clouds' house?</p> <p>4 A March 7, 2014.</p> <p>5 Q And how did the evidence get from</p> <p>6 Broomall, Pennsylvania, up to the Wright Group, if</p> <p>7 you know? I think there was a folder Chain of</p> <p>8 Custody.</p> <p>9 A There was. I just want to check one</p> <p>10 thing.</p> <p>11 It was delivered by IEI Consulting.</p> <p>12 Q And it was delivered on March 7th, 2014;</p> <p>13 is that right?</p> <p>14 A Right. That's the day we received it.</p> <p>15 Q Did you take any -- or did you or anyone</p> <p>16 at the Wright Group take photographs of the</p> <p>17 evidence when it was delivered?</p> <p>18 A Not on the exact day, but it would have</p> <p>19 remained packaged as we found it, and we would have</p> <p>20 taken photographs how we received it when we</p> <p>21 started our nondestructive examination, and that</p> <p>22 occurred on March 18, 2014.</p> <p>23 Q Okay. And were you the only person from</p> <p>24 the Wright Group involved in the -- that was</p>	<p style="text-align: right;">32</p> <p>1 before we started, I have printed out your</p> <p>2 photographs from April 18th, 2014, which is --</p> <p>3 A Right.</p> <p>4 Q -- after.</p> <p>5 A Yes. That's the first exam. I have</p> <p>6 photographs with me on thumb drive today of the</p> <p>7 nondestructive examination.</p> <p>8 Q Okay. Can we --</p> <p>9 A As long as we can use a computer, sure.</p> <p>10 MS. YEMMA: I can boot mine up,</p> <p>11 Pat, if we can't use yours.</p> <p>12 MR. HUGHES: That would</p> <p>13 actually be better, if you wouldn't mind</p> <p>14 doing that.</p> <p>15 THE WITNESS: Both cases are on</p> <p>16 it. Cloud and Vitale are on there.</p> <p>17 MR. HUGHES: Sanitizer on</p> <p>18 there? Not from a sickness standpoint,</p> <p>19 but I mean there's nothing there that</p> <p>20 would be privileged or confidential</p> <p>21 communications?</p> <p>22 THE WITNESS: I don't think so.</p> <p>23 It's PDF copies of my report and then</p> <p>24 whatever scans that were sent over from</p>
<p style="text-align: right;">31</p> <p>1 performing the nondestructive testing?</p> <p>2 A No. I don't -- I may have been present</p> <p>3 during it, but, again, that may have been Mr.</p> <p>4 D'Addario.</p> <p>5 Q Anthony; is that right?</p> <p>6 A Anthony. It's just easier to say</p> <p>7 Anthony.</p> <p>8 Q Is that okay?</p> <p>9 A Yeah, that's fine.</p> <p>10 Q Okay. We're talking about the same</p> <p>11 person.</p> <p>12 Did Anthony take pictures?</p> <p>13 A Yes.</p> <p>14 Q Okay. And are those pictures part of</p> <p>15 your file for this matter?</p> <p>16 A They are, yes.</p> <p>17 Q Okay. And with regard to the venting, do</p> <p>18 you -- do you know how it was transported with the</p> <p>19 dryer, like, what the orientation of it was?</p> <p>20 A I'd have to look back through the</p> <p>21 photographs to see how we received it.</p> <p>22 Q Okay.</p> <p>23 A That's certainly something we can do.</p> <p>24 Q Can we -- so I -- as I had told you</p>	<p style="text-align: right;">33</p> <p>1 Electrolux.</p> <p>2 MR. HUGHES: You have photos?</p> <p>3 THE WITNESS: All the full-size</p> <p>4 ones are in photos, and then PDF, there's</p> <p>5 a sheet like she has over there.</p> <p>6 MR. HUGHES: Do you have any</p> <p>7 preference? Do you want to see them all,</p> <p>8 or do you want four to a page?</p> <p>9 MS. YEMMA: I really want to</p> <p>10 see how the venting was -- so however</p> <p>11 it's easier for you. And are they saved</p> <p>12 by JPG so we can refer to it?</p> <p>13 THE WITNESS: There's photo</p> <p>14 numbers under each one.</p> <p>15 BY MS. YEMMA:</p> <p>16 Q Okay. So I think the last -- can you --</p> <p>17 well, I'll just ask the question again. Mike, we</p> <p>18 took a brief break off the record to pull up some</p> <p>19 photographs, and I believe I had asked you how the</p> <p>20 evidence was received by the Wright Group back in</p> <p>21 March of 2014, so now that we have these</p> <p>22 photographs pulled up, are you able to answer that</p> <p>23 question?</p> <p>24 A Yes.</p>

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<p style="text-align: right;">34</p> <p>1 Q Okay. And if you would -- however you 2 want to refer to it, but if you could refer to the 3 photograph that reflects the way the evidence was 4 received. 5 A Sure. Images -- well, just on this one 6 image, anyway, 2, 3, and 4 show the photograph as 7 we -- show the dryer as we received it in those 8 photographs. 9 They show a shrink-wrapped and some duct 10 tape holding the venting in a nearly vertical 11 arrangement to the back of the dryer, at least the 12 rigid venting, anyway, and then it appears in the 13 photographs that the flexible foil transition duct 14 was taped to the top of the dryer lid. 15 MS. YEMMA: All right, Pat. We 16 may need to go back to those. 17 MR. HUGHES: I'll leave them 18 open. 19 MS. YEMMA: If you don't mind, 20 or we can switch to my laptop, too. 21 BY MS. YEMMA: 22 Q And, Mike, the evidence is still at the 23 Wright Group; is that -- 24 A You know, to be honest with you, I'm not</p>	<p style="text-align: right;">36</p> <p>1 the back that went to the right along the floor. 2 That was connected to a pair of elbows, 3 90-degree -- approximately 90-degree elbows, and 4 then about a six-foot section of rigid ducting, 5 then to a metal vent hood with a 6 two-and-a-half-inch opening. 7 Q Okay. The flexible foil transition duct, 8 how long was it, if you know? 9 A Well, obviously since it's flexible, it 10 can be manipulated. I think one of my 11 measurements, at least in the report when we did 12 the first exam, I believe, was -- it measured about 13 ten inches the way we received it, but there was a 14 total of 30 coils, so it could have been longer 15 than that. 16 Q So 30 coils if it's stretched out would 17 be about how long? 18 A Approximately an inch per coil, so 19 approximately a maximum length of 30 inches if it 20 was fully stretched, but there were -- well, there 21 was one -- at least one bend in the foil ducting, 22 so that wouldn't have allowed it to make a full 23 30-inch straight stretch. 24 Q And the six-foot section of venting,</p>
<p style="text-align: right;">35</p> <p>1 certain. I think it is. I'm 90 percent sure it 2 is. It's probably there unless Pat or someone has 3 told us to ship it elsewhere. 4 MR. HUGHES: It better be 5 there. 6 MS. YEMMA: Okay. 7 THE WITNESS: I think we have 8 all your evidence. 9 BY MS. YEMMA: 10 Q Okay. Mike, is it your understanding 11 that all of the venting for the Clouds' dryer was 12 collected from the fire scene? 13 A Yes. Based on the scene photographs that 14 I looked at, it looks like all the venting was 15 collected. 16 Q Okay. And if you could just for -- I 17 know you've explained it in your report, but just 18 to set a foundation, if you could just describe how 19 the dryer was -- or your understanding of how the 20 dryer was vented. 21 A Sure. 22 So from -- starting from the exhaust 23 connection on the back of the dryer, there was a 24 flexible foil transition duct that was attached to</p>	<p style="text-align: right;">37</p> <p>1 what -- what was that venting made out of? Was it 2 rigid venting? 3 A Yeah, sheet metal. 4 Q Sheet metal? 5 A Rigid sheet metal. We refer to it as 6 rigid. 7 Q I do, too. 8 A Okay. And that included the elbows and 9 the hood were also sheet metal as well. 10 Q So the six-foot section of the rigid 11 venting, was that in sections? 12 A It was. Let me look to see specifically. 13 I think there were two photos. Yeah, there were 14 three sections that were two feet long each. 15 The way we received the venting, two of 16 the sections were connected together along with the 17 metal vent hood, and then the third straight 18 section that was two feet long was wrapped 19 separately, and then we had a metal elbow 20 arrangement and the flexible foil transition 21 ductwork connected together also separately. 22 Q And you had an opportunity to examine the 23 flexible foil venting; is that right? 24 A Yes.</p>

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<p style="text-align: right;">38</p> <p>1 Q Okay. Were you able to make a 2 determination whether it was the Smart Choice 3 branded venting or not? 4 A Let me just check my notes. I did not 5 find any identifying marks on the flexible 6 transition duct. It could -- it could have been a 7 Smart Choice brand foil duct. 8 I believe that that one Electrolux 9 distributes has a paper adhesive label on it, and 10 since it was only 30 inches long, that would 11 indicate that it was cut to length, so regardless 12 of who manufactured it, the missing section would 13 have had whatever manufacturing label on it. 14 The only other alternative I'm aware of 15 is Deflecto which screen prints their name on the 16 coils every, like, four or five coils, so that is 17 something we typically see. If the venting has 18 been trimmed, we can tell if it's a Deflecto brand. 19 Q Okay. But as you sit here today, you 20 don't know one way or the other whether it was 21 Deflecto or Smart Choice or some other brand? 22 A That's true. 23 Q Do you have an understanding of where the 24 vent hood was located at the time of the fire?</p>	<p style="text-align: right;">40</p> <p>1 should I say. 2 BY MS. YEMMA: 3 Q Was someone else from Wright Group 4 present? 5 A Yes. 6 Q Who was -- was that -- 7 A Wayne Miller. Because it had already 8 been examined, it was kind of like proctoring the 9 exam. It was a reinspection. 10 Q Oh, no. I'm talking about the one in 11 April of -- 12 A I was present for that one. 13 Q So just to -- 14 A I just want to clarify the whole 15 situation. 16 Q Okay. So for the first joint exam, you 17 were present. That was on April 18th of 2014? 18 A Yes. 19 Q For the whole exam? 20 A Correct, and that was conducted with Mike 21 Rains of EFI. 22 Q Then we had Mr. Crabtree come to the 23 Wright Group to inspect the evidence. I think that 24 was in July of last year? Yes, July 9th, 2015. Do</p>
<p style="text-align: right;">39</p> <p>1 A On the outside of the building. 2 Q But do you know -- I was trying to set a 3 foundational question, but -- so do you know how 4 far it was off the ground? 5 A Only approximately. I think based on the 6 scene photographs that I remember viewing prior to 7 the deposition, it was maybe three to six inches 8 off the ground, something like that. 9 Q Okay. So during -- the first time you 10 examined the evidence would have been in April of 11 2014; is that right? 12 A That's correct. 13 MS. YEMMA: Okay. And I'm just 14 going to mark those photographs now as 15 Stoddard-4. 16 (At this time, photographs were 17 marked for identification as Exhibit 18 Stoddard-4.) 19 THE WITNESS: Due to -- I was 20 just looking through my inspection notes. 21 I don't know if I clarified it before or 22 not, but I was -- I don't think I was 23 present the whole time during the second 24 evidence exam or the joint evidence exam,</p>	<p style="text-align: right;">41</p> <p>1 you agree with that? 2 A Yes, that's correct. 3 Q And you were only present for part of 4 that exam? 5 A Yeah, I was only there -- I had another 6 job I was tied up with, so Mr. Miller proctored the 7 exam, or the reexamination, I guess. 8 Q Mike, did you take any pictures during 9 the reexamination? 10 A Mr. Miller did. That was his job. 11 Q Okay. And have Mr. Miller's photographs 12 been produced in this case? Do you know? 13 A I don't know if they've been produced. I 14 did bring them today. Again, they're on the thumb 15 drive. 16 Q If we need to look at it, we can. 17 All right. So during the first joint 18 exam, did you have an opportunity to examine the 19 venting? 20 A I did. 21 Q Did you examine all of it? 22 A Yes. 23 Q Were the -- so the six-foot section of 24 rigid venting, that was in three parts, right?</p>

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<p style="text-align: right;">42</p> <p>1 A It was -- well, it depends how you want 2 to say that. 3 Q Okay. 4 A It was comprised of three different 5 sections, but when we examined it, two of the 6 sections were still combined together, attached. 7 Q All right. So I'm going to take the 8 venting in parts. So let's start with the flexible 9 foil transition part of the venting. 10 A Sure. 11 Q Were you -- did you examine that venting? 12 A I did. 13 Q Were you able to see end to end? 14 A Yes. 15 Q Did you see any lint accumulation in the 16 flexible foil venting? 17 A There was some between the ridges of the 18 venting, yes, just a coating. 19 Q Just a coating? 20 A Yeah, nothing -- nothing significant that 21 blocked it or anything. 22 Q Okay. So then moving from the dryer 23 outside, the next piece would be the pair of 24 elbows?</p>	<p style="text-align: right;">44</p> <p>1 Q Okay. Do you -- is there a photograph -- 2 well, could you find a photograph that shows what 3 you just described? 4 A Certainly. Do you want me to refer to my 5 report or in the main photographs? 6 Q Are the numbers the same? 7 A No. There's no numbers in my report, 8 so -- 9 Q That's fine. We can refer to the report. 10 I have that, too. So if you could just point me to 11 the page. 12 A Sure, page 41. 13 Q Okay. So I see eight photographs. Is 14 that the -- which of the eight are you referring 15 to? 16 A The top left, top right, and the second 17 one down on the left are of the -- are this section 18 of the venting that we're talking about, that 19 first -- that first two-foot section. 20 Q Okay. So if we could -- do you mind just 21 marking with my pen, putting numbers so we know 22 what we're -- like, 1, 2? 23 A Sure. 24 Q And you can do it however you'd like.</p>
<p style="text-align: right;">43</p> <p>1 A That's correct. 2 Q Did you examine the elbows? 3 A I did. 4 Q Okay. Could you see end to end? 5 A Well, they're elbows, so not exactly, but 6 the interior of the elbows were clean and clear. I 7 mean, there might have been a little minor bit of 8 lint in there, but nothing -- nothing substantial 9 certainly. 10 Q Okay. And then the next part of the 11 venting would be the six-foot section. Now, was -- 12 you just said two of the sections were together. 13 Was that next after the elbows? 14 A No. The single two-foot section would 15 have been after the elbows. 16 Q Okay. So the single two-foot section, 17 did you examine it? 18 A I did. 19 Q Okay. And could you see end to end? 20 A No. 21 Q Okay. And why not? 22 A There was a conglomeration, I guess, of 23 lint and other debris in the venting that had 24 settled at one end.</p>	<p style="text-align: right;">45</p> <p>1 A I'll just put them beside each photo. 2 Q So when we go back and look at the -- 3 A 1 on the upper left, 2 on the upper 4 right, and 3 on the second down on the left. 5 Q So you just marked photographs with a 1, 6 2, and 3 on page 41, and those are photographs that 7 you took of the single section of the two-foot 8 venting? 9 A Correct. 10 Q Okay. So just looking at Photograph 2, 11 did -- during the inspection with Mr. Rains, did 12 you remove the material that was in the venting? 13 A We did not. 14 Q Was that done at a later inspection when 15 Mr. Crabtree came? 16 A Yes. Mr. Crabtree removed the lint with 17 Mr. Miller. 18 Q Do you have an opinion as to whether the 19 material we see in the venting in Photograph 2 on 20 page had 41 existed at the time of the fire? 21 A I do. 22 Q Okay. And what is that opinion? 23 A Certainly the lint that was -- that made 24 up this blockage of the venting, it was in the pipe</p>

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<p style="text-align: right;">46</p> <p>1 somewhere in the exhaust during the fire, and most 2 likely in that two-foot section that we're 3 specifically discussing, but not in the 4 orientation. 5 Based on the coloration of the lint and 6 the way it's situated in the pipe, it's my opinion 7 that that broke loose during evidence collection 8 and transport and settled -- settled at one end. 9 Q Okay. So you said -- you mentioned the 10 coloration, right? 11 A Yes. 12 Q Okay. And what is it about the 13 coloration of the material you see in Photograph 2 14 that suggests to you that -- well, what is it about 15 the coloration? 16 A Well, there's evidence of discoloration 17 from soot or smoke in some of the lint. It's 18 not -- it's not even. It's intermingled in that 19 conglomeration, and even Mr. Crabtree's photographs 20 later when he kind of pulled them apart shows that 21 its -- its coloration says that it was after the 22 event. 23 Q Okay. I'm going to pull up the 24 photographs that Mr. Crabtree had attached to his</p>	<p style="text-align: right;">48</p> <p>1 Q Okay. And it also appears that there 2 is -- and I'll refer to it as a white powdery 3 substance that's on the material that's in the 4 venting and then also on the table or the surface 5 below the venting. Would you agree with that? 6 A I would. 7 Q Do you know what that material is? 8 A It appears to be some type of byproduct 9 of corrosion. 10 Q Okay. And do you have an opinion as to 11 why that's in the venting? 12 A The pipe is a galvanized metal, so, you 13 know, that's just the way it's exposed to the 14 environment, especially with moisture going through 15 the venting. When the dryer is running, it leads 16 to corrosion inside the pipe. 17 Q Okay. All right. So I'm just going down 18 the photographs. So if we could turn our attention 19 to Photograph 44, AEL No. 44. 20 MR. HUGHES: And, again, just 21 for the record, that's a photograph 22 that's contained in Jim Crabtree's 23 report? 24 MS. YEMMA: Yes.</p>
<p style="text-align: right;">47</p> <p>1 report of when he pulled the lint out, because I 2 don't think you have any in your report; is that 3 right? 4 A That's correct. I didn't pull the lint 5 out, so -- 6 Q Okay. It wasn't -- I wasn't being 7 critical. 8 A I mean, we probably have photos from Mr. 9 Miller, but Mr. Crabtree's show it I'm sure just 10 the same. 11 Q And if you would like to look at Mr. 12 Miller's photographs, we can, too. 13 A Okay. 14 Q Okay. So, Mike, I'm going to show you -- 15 so attached to Mr. Crabtree's report, there were a 16 number of photographs, so this is in the series of 17 those photographs, and I'm sorry. I don't have a 18 printed out copy. This is photograph AEL number 19 41. 20 A Okay. 21 Q Do you recognize what's depicted in that 22 photograph? 23 A Sure. It appears to be the same end of 24 the pipe as I marked as No. 2.</p>	<p style="text-align: right;">49</p> <p>1 BY MS. YEMMA: 2 Q Do you recognize what's depicted in this 3 photograph? 4 A I do. It looks like that's the section 5 of lint and other debris that Mr. Crabtree removed. 6 Q And, Mike, during this portion of the 7 exam, were you present? 8 A I was not. 9 Q Okay. Have you had an opportunity, 10 either during Mr. Crabtree's inspection or sometime 11 later, to examine the material he pulled out from 12 the venting? 13 A I don't recall when I received Mr. 14 Crabtree's photographs, but I did look at Mr. 15 Miller's photographs of the same material, and that 16 was even before authoring my report. 17 Q Did you have an opportunity to physically 18 examine the material? I realize you looked at the 19 photographs, but did you -- 20 A I didn't. I mean, I physically examined 21 the material the first time I looked at it, but not 22 after it was removed from the pipe. 23 Q Okay. Fair enough. 24 Okay. Do you have any opinion as to</p>

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<p style="text-align: right;">50</p> <p>1 why -- I'm sorry. I'm going back to 44 -- why the 2 material that was pulled out of the venting, it's 3 matted together, like, it's clumped together? 4 A I do. 5 Q Okay. And what is that opinion? 6 A Again, from vibrations and things like 7 that from the collection and transport of the 8 venting in an upright position, it had settled 9 down, you know, when it was driven from 10 Pennsylvania to Massachusetts to our lab. 11 Q So you said -- what I thought you said 12 earlier in your testimony is that the material that 13 was pulled out from the section of venting, you 14 believe that it was all contained within that 15 two-foot section, though, at the time of the fire; 16 is that fair? 17 A Well, it's hard for me to say that 18 because I haven't seen any exact photos of what the 19 venting looked like in any detail before it was 20 removed. 21 It's possible some of that lint could 22 have been from the joint, and depending on how the 23 joint overlaps, it could have actually been from 24 the pipe that was attached to it as well.</p>	<p style="text-align: right;">52</p> <p>1 looking at it afterwards. 2 Q Mike, I don't think I asked you this 3 before, but when you received the venting, was the 4 one-foot -- I'm sorry -- the single two-foot piece 5 attached to the elbow? 6 A It was not. I'd have to look in my 7 pictures to double-check that, but I don't believe 8 it was. 9 THE WITNESS: Pat, can you 10 bring up those pictures that we were 11 looking at earlier? 12 No, it was not. 13 BY MS. YEMMA: 14 Q Was it attached to the other two pieces 15 of rigid when you received it? 16 A No. It was -- that single two-foot piece 17 was shrink-wrapped individually. It was next to 18 it. It was attached by duct tape to those pieces, 19 but it was, you know, not -- not attached in the 20 way it would have been installed certainly, and, 21 again, both of those sections of rigid ducting, the 22 straight sections were vertically arranged. 23 Q Understood. 24 During the inspection with Mr. Rains, was</p>
<p style="text-align: right;">51</p> <p>1 Q So how were the pieces attached, so from 2 the one -- the single section, the two-foot to the 3 other four feet? 4 A Sure. 5 The venting itself is in -- is an 6 arrangement where there's a crimped end, which is 7 essentially the male end, and then there's an 8 uncrimped end, which is the female end. They slide 9 together, and then they use tape to secure the 10 joints in this particular case. 11 Q Mike, have you seen any photographs from 12 the fire scene that document the interior of that 13 two-foot section of the venting that we were 14 just -- that we've been looking at in these 15 photographs? 16 A Not to any detail, no. I've seen the 17 venting in place from the fire scene, but I haven't 18 seen anything, you know, looking down, and that's 19 just an unfortunate result of the way the venting 20 is. 21 It's really difficult to photograph -- 22 with the elbows in the way and the hood on the 23 other end, to photograph every inch of the venting 24 before it's removed. We're typically, you know,</p>	<p style="text-align: right;">53</p> <p>1 there any reason why you did not remove the 2 material that we see in Photograph 44 from the 3 venting? And, again, I'm referring to 44 from Jim 4 Crabtree's report. 5 A I don't recall any specific reason. I'm 6 sure Mr. Rains and myself had a conversation of 7 whether it was necessary, and for some reason, I 8 think he said, "No, we don't need to open it up." 9 In some cases we do, depending on what 10 the other side wants to do. Sometimes we'll cut 11 open venting and separate the whole thing, and in 12 this case, I would say it was probably just a 13 mutual agreement not to. 14 Q So just going back to the material that 15 was pulled out of the venting, you mentioned that 16 you see evidence of corrosion, right? Am I 17 characterizing what you said correctly? 18 A That's what that white powder appears to 19 be is corrosive material or some other type of 20 foreign substance. 21 Q Okay. Do you have an opinion as to why 22 corrosion occurred? 23 A Sure. 24 MR. HUGHES: Object to form,</p>

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<p style="text-align: right;">54</p> <p>1 but go ahead.</p> <p>2 THE WITNESS: The metal they</p> <p>3 use is coated with a galvanized process.</p> <p>4 It's a zinc-based coating, and when it's</p> <p>5 exposed to moisture and certain</p> <p>6 conditions, heat and moisture</p> <p>7 specifically, which is exactly what's</p> <p>8 passing through a duct, there can be</p> <p>9 conditions where that breaks down, and if</p> <p>10 there's any type of chemical additions to</p> <p>11 the laundry, any type of, you know,</p> <p>12 bleach or anything like that that isn't</p> <p>13 washed out very well -- people load</p> <p>14 bleach into their clothes, and there's a</p> <p>15 lot of different factors that can cause</p> <p>16 different types of chemical reactions</p> <p>17 depending on the type of coating that is</p> <p>18 on that metal.</p> <p>19 MR. HUGHES: Let me stop here.</p> <p>20 (Brief interruption.)</p> <p>21 BY MS. YEMMA:</p> <p>22 Q Did you see any evidence of laundry</p> <p>23 detergent in the material that was pulled from the</p> <p>24 venting?</p>	<p style="text-align: right;">56</p> <p>1 I know again Mr. Crabtree's opinions are</p> <p>2 that it was blown in there because the screen was</p> <p>3 either not in place or was damaged, but I've yet to</p> <p>4 see, especially when allegedly the venting is so</p> <p>5 bad that it's blocked completely.</p> <p>6 I don't see any scientifically reliable</p> <p>7 method to blow a penny several feet down through a</p> <p>8 corrugated flexible duct without getting caught</p> <p>9 somewhere either in the duct or the elbow before</p> <p>10 ending up, you know, halfway down the rigid</p> <p>11 venting. His opinions there just don't make any</p> <p>12 sense to me.</p> <p>13 Q So if someone had, like, a pair of pants</p> <p>14 and had a penny in it and they went in the dryer</p> <p>15 and the lint screen wasn't in place, do you -- I</p> <p>16 mean, is it possible that the penny could end up in</p> <p>17 the venting?</p> <p>18 MR. HUGHES: Object to form.</p> <p>19 THE WITNESS: I -- I mean, the</p> <p>20 penny could end up in the venting for</p> <p>21 maybe some other possible reason, but the</p> <p>22 airflow wouldn't dictate that the penny</p> <p>23 would escape out of the trap ducts</p> <p>24 through whatever lint that may have been</p>
<p style="text-align: right;">55</p> <p>1 A Not specifically. I mean, I read Mr.</p> <p>2 Crabtree's report, and I understand that's his</p> <p>3 opinion, that this is laundry detergent. It</p> <p>4 doesn't make any scientific sense for there to be</p> <p>5 laundry detergent from regular dryer operation.</p> <p>6 If that white powder was laundry</p> <p>7 detergent, it's just something that somehow ended</p> <p>8 up in there after the fire, whether it's fire</p> <p>9 debris or washing it down or something, but I don't</p> <p>10 see it as laundry detergent. I would disagree with</p> <p>11 his opinions.</p> <p>12 Q Mike, did you see any evidence that</p> <p>13 anything was washed into the venting, for lack of a</p> <p>14 better word, in conjunction with the fire</p> <p>15 suppression efforts?</p> <p>16 A Well, again, I mean, it's -- I don't know</p> <p>17 if washed is the good -- is the good -- is the best</p> <p>18 terminology.</p> <p>19 There was certainly -- there was a penny,</p> <p>20 and there was some papers in amongst the debris</p> <p>21 that Mr. Crabtree pulled out. I don't know if that</p> <p>22 was washed there or not, but certainly that's</p> <p>23 something that I wouldn't expect to find in there,</p> <p>24 specifically the penny.</p>	<p style="text-align: right;">57</p> <p>1 accumulated in there. It would have been</p> <p>2 caught by that lint most likely.</p> <p>3 There's a couple different</p> <p>4 lips. There's a fan blower assembly that</p> <p>5 it would have to make it through, and</p> <p>6 then again in this specific case, we have</p> <p>7 the flexible foil ducting that has a bend</p> <p>8 in it right behind the dryer.</p> <p>9 Then there's all those ridges</p> <p>10 of the individual coils that are formed</p> <p>11 there with some lint accumulation there,</p> <p>12 and then there's another arrangement of</p> <p>13 elbows before it even gets to where he</p> <p>14 found it.</p> <p>15 So, again, I don't know where</p> <p>16 the penny is in the ductwork, but it's my</p> <p>17 opinion that I don't think it's possible</p> <p>18 to be blown in there from airflow.</p> <p>19 BY MS. YEMMA:</p> <p>20 Q Okay. And the next question I was going</p> <p>21 to ask you, if you have any idea, theory, as to how</p> <p>22 the penny got into the venting, but I think you</p> <p>23 answered no, but if you could confirm that.</p> <p>24 A I don't know if it's post-fire. When</p>

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<p style="text-align: right;">58</p> <p>1 they collected it, maybe it was swept up with 2 debris and, again, settled down in there or 3 something. I am not certain. 4 I don't have a reason why the penny is in 5 the ductwork, but I don't think it's because of 6 airflow from a dryer. 7 Q And we got a little ahead of ourselves 8 talking about that, but just -- so moving towards 9 the outside of the house with regard to the 10 venting, after the single section of rigid, then 11 there was the section of four -- it was four feet, 12 right, of rigid venting? 13 A Four feet comprised of two different 14 sections. 15 Q And you examined that part of the 16 venting? 17 A I did. 18 Q And did you -- were you able to see end 19 to end? 20 A Yes. You could see light through it. 21 There were accumulations of lint in there. Page 22 40, the bottom right picture shows -- it shows my 23 photograph. 24 Of course, the hood is on the opposite</p>	<p style="text-align: right;">60</p> <p>1 how it was received, because the storage space and 2 such, and that obviously caused some disturbing of 3 the lint in the venting. 4 Q During your inspection in April of -- 5 sorry. I lost the date. 6 A 2014. 7 MR. HUGHES: The nondestructive 8 exam? Or you're talking about the exam 9 with Mike Rains? 10 MS. YEMMA: The one with Mike 11 Rains. 12 BY MS. YEMMA: 13 Q We're on the same page, I think, right? 14 A Yes. 15 Q Did you remove the material that was -- 16 that you see in the photograph at the bottom of 17 page 40? 18 A We did not. 19 MR. HUGHES: The bottom of page 20 41? 21 THE WITNESS: No, it's 40. 22 MS. YEMMA: We're talking about 23 40, this photograph. 24 BY MS. YEMMA:</p>
<p style="text-align: right;">59</p> <p>1 end as I'm taking that photograph, so that's going 2 to limit the amount of light that's coming in. 3 Obviously we're trying to photograph that as best 4 as possible. Photographing inside of a four-inch 5 duct is not always easy. 6 Q I understand. 7 Okay. To show you another picture from 8 Jim's report, so this is AEL No. 52. Do you 9 recognize what's depicted in this photograph? 10 A I do. That's the dryer end of the two 11 sections of pipe with the hood on the opposite end. 12 Q So the material that we see inside of the 13 venting, is that what you also saw when you 14 examined it? 15 A No. It was in a different condition when 16 we -- when we saw it. 17 Q Okay. So can you describe what the 18 condition was, or point me to a photograph? 19 A Sure, bottom right of page 40 of my 20 report. 21 Q Okay. 22 A The lint has settled down the bottom 23 again. Once we had the joint exam, we stored the 24 venting in another vertical arrangement just like</p>	<p style="text-align: right;">61</p> <p>1 Q So you did not remove the material, Mike? 2 A We did not. 3 Q Any reason why not? 4 A Again, just through mutual agreement that 5 we saw it was in the venting, and that was fine for 6 both of us. 7 Q Okay. Did you -- did you draw any 8 conclusions as to what the material consisted of? 9 I'm talking about what you see in the venting on 10 page 40. 11 A Sure. Again, there was -- there was lint 12 in there, there was soot in there, you know, some 13 threads and whatever else, you know, fabric-type 14 material. And, again, it was different from what 15 Mr. Crabtree photographed that shows the penny and 16 I think some paper in there. 17 Q So if we look at -- again, this is also 18 Mr. Crabtree's report. This would be AEL No. 53. 19 Have you seen this photograph before? 20 A I have. 21 Q Okay. And do you know what is depicted 22 in this photograph, which is 53? 23 A This is the material that Mr. Crabtree 24 removed from some section of the venting. I</p>

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<p style="text-align: right;">62</p> <p>1 believe it's the same section we're discussing.</p> <p>2 Q Were you present during the inspection</p> <p>3 with Mr. Crabtree when he removed the material from</p> <p>4 the venting?</p> <p>5 A I was not, no.</p> <p>6 Q But you've had an opportunity to review</p> <p>7 the -- to see his photographs?</p> <p>8 A Yes.</p> <p>9 Q Okay.</p> <p>10 A After I wrote my report prior to the</p> <p>11 deposition.</p> <p>12 Q So it looks like there are materials</p> <p>13 not -- that aren't lint and aren't soot that he</p> <p>14 pulled from the venting. Would you agree with</p> <p>15 that?</p> <p>16 A Yeah. There's paper in there. Again,</p> <p>17 there's threads and hair, like, some stuff that you</p> <p>18 would associate with laundry material, certainly.</p> <p>19 Q And there was also a penny found in that</p> <p>20 material; is that -- do you agree with that?</p> <p>21 A Yeah, in some section of the venting. I</p> <p>22 don't remember what section he found that in, but</p> <p>23 that was somewhere in the rigid venting.</p> <p>24 Q So with regard to -- let's just talk</p>	<p style="text-align: right;">64</p> <p>1 fire?</p> <p>2 A I can't say for certain, but, again, if</p> <p>3 it was soot-covered, I'd be able to say more</p> <p>4 accurately that it was. In this case, I just don't</p> <p>5 know.</p> <p>6 Q Mike, as you sit here, do you -- do you</p> <p>7 know how big the holes are in the lint screen?</p> <p>8 Have you ever measured them or seen any documents</p> <p>9 that would give that measurement to you?</p> <p>10 A You're talking about the screen or the</p> <p>11 lint trap?</p> <p>12 Q The lint -- the lint trap or screen,</p> <p>13 however -- the lint screen, let's call it.</p> <p>14 A Okay. Well, in --</p> <p>15 MR. HUGHES: Give the</p> <p>16 differentiation.</p> <p>17 THE WITNESS: The lint screen</p> <p>18 is the removable piece of plastic</p> <p>19 blade -- some people call it a blade for</p> <p>20 some reason -- that slides in, and that</p> <p>21 has a mesh -- fine mesh screen on it.</p> <p>22 MS. YEMMA: That's what I'm</p> <p>23 talking about, but let's make sure we</p> <p>24 have the same term.</p>
<p style="text-align: right;">63</p> <p>1 about the paper. Do you have -- were you able to</p> <p>2 draw any conclusion as to whether that was in the</p> <p>3 venting at the time of the fire?</p> <p>4 A Specifically in this photograph, his</p> <p>5 Photograph No. 53, I don't see any soot damage to</p> <p>6 the paper, and there was definitely soot, you know,</p> <p>7 throughout the venting in some of the other lint in</p> <p>8 different areas.</p> <p>9 So it's possible that paper could have</p> <p>10 been in the venting, and it may have been protected</p> <p>11 by lint on top of it, but certainly it wasn't on</p> <p>12 the exposed surface or it would be covered and</p> <p>13 subjected to soot.</p> <p>14 Q So it sounds like from your last answer</p> <p>15 you can't tell -- you can't tell either way whether</p> <p>16 it was in the venting or not?</p> <p>17 MR. HUGHES: Objection.</p> <p>18 THE WITNESS: The paper is</p> <p>19 possible. It could have been in the</p> <p>20 venting.</p> <p>21 BY MS. YEMMA:</p> <p>22 Q Okay. There was nothing to suggest to</p> <p>23 you that it definitely wasn't in the venting, the</p> <p>24 paper wasn't in the venting at the time of the</p>	<p style="text-align: right;">65</p> <p>1 THE WITNESS: The lint trap is</p> <p>2 the place where that flows in there. The</p> <p>3 lint flows through the lint trap, through</p> <p>4 the lint opening, and then through the</p> <p>5 lint screen.</p> <p>6 The lint screen does not catch</p> <p>7 all the materials, unlike Mr. Crabtree's</p> <p>8 assumption. I would agree -- I think I</p> <p>9 know where you're going with this, so</p> <p>10 I'll just stop there. Ask your questions</p> <p>11 and we'll keep going. Was your question</p> <p>12 how big the lint screen holes were?</p> <p>13 BY MS. YEMMA:</p> <p>14 Q That was my question. Do you know?</p> <p>15 A I can't remember offhand. I think</p> <p>16 they're just slightly smaller than, like, a 16th of</p> <p>17 an inch in diameter or square or whatever they are,</p> <p>18 but that's not going to prevent something like</p> <p>19 paper from getting into it. I can tell you why.</p> <p>20 Q Okay. And why is that?</p> <p>21 A The paper is small enough that it can get</p> <p>22 through the lint trap openings. When it collects</p> <p>23 in the lint screen, when people pull the lint</p> <p>24 screen up, it can fall off and travel into the trap</p>

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<p style="text-align: right;">66</p> <p>1 duct and be present down in the trap duct and be 2 present below the lint screen. 3 When you reinstall the lint screen, that 4 paper is still below the lint screen, and then it 5 can travel through the system, and that's how 6 things like threads and other items that we see in 7 this lint can get into the -- into the vent system. 8 It's because those are small enough and 9 light enough that the airflow can carry that 10 through the venting unlike a penny which is pretty 11 unlikely. 12 Myself, I owned an Electrolux dryer. I 13 was constantly having problems with lint buildup in 14 the trap duct which wouldn't allow the lint screen 15 to seat all the way, which would also create gaps 16 or small items like this to pass through. 17 Q Okay. All right. If you could look at 18 page 39 of your report. 19 Okay. So in the middle of that 20 paragraph, in looking at the sentence where it 21 states -- and I'll point to you. It says, "In our 22 opinion" -- sorry. "It is our opinion that the 23 rigid ducting was approximately 50 percent 24 restricted with lint or less prior to the fire."</p>	<p style="text-align: right;">68</p> <p>1 accumulations of lint that were still adhered to 2 the interior walls of the rigid duct sections, both 3 the two footers that were attached to make the 4 four-footer and the one two-footer that was 5 unattached. 6 There was lint that was still adhered to 7 the outer wall, and then basing the amount of lint 8 that was again, in my opinion, through transport 9 dropped down to one end, if you kind of look at the 10 length of the ducting and how much lint was there, 11 I made an estimation as to how much lint would have 12 filled the cross-sectional area of the duct. 13 Q Okay. So I think the only piece of the 14 venting that we haven't talked about would be the 15 exhaust hood. Have you had -- did you have an 16 opportunity to examine it? 17 A I did. 18 Q Okay. And was there any lint 19 accumulation on the exhaust hood? 20 A In the exhaust hood, there was. 21 Q Okay. 22 A The outside was pretty clean. 23 Q And there -- can you point to photographs 24 in your report that represent the condition of the</p>
<p style="text-align: right;">67</p> <p>1 Do you see that sentence? 2 A I do. 3 Q And I read that correctly? Is that 4 right? 5 A Yes. 6 Q Okay. You're talking about the two-foot 7 single section of the venting? 8 A I'm talking about the full six-foot 9 section of rigid ducting. I'm even talking about 10 the rigid elbows, but based upon my estimate, again 11 I think the lint has shifted significantly since 12 the time of the fire. 13 It's hard to estimate that exactly, but 14 there would have been no more than a 50 percent 15 restriction of lint in the venting, and likely that 16 was fairly even around the outside circumference of 17 the venting, maybe a little bit lower, a little bit 18 greater on the bottom because of gravity, but I 19 don't believe there was any significant blockage 20 that we see in the photographs. 21 Q How did you arrive at the 50 percent for 22 the vent -- what evidence do you have to support 23 that? 24 A By looking at the actual remaining</p>	<p style="text-align: right;">69</p> <p>1 exhaust hood as you examined it? 2 A Sure. There's three on page 40 of my 3 report. That would be the two in the middle, the 4 middle row, and also the bottom, bottom left. 5 Q When you examined the opening to the 6 exhaust hood, was it operational? 7 A I don't understand your question. 8 Q Sorry. 9 Could you open the flap of the exhaust 10 hood? 11 A The damper, yeah. 12 Q The damper. 13 A The damper was operational. It moved 14 back and forth. 15 Q Thanks. 16 Mike, you're familiar with Mr. Cloud's 17 testimony in this matter with regard to the fact 18 that he cleaned the venting? 19 A Yes, I'm familiar with his testimony. 20 Q In your -- in your examination of the 21 venting, do you believe that the condition of the 22 venting is consistent with what Mr. Cloud testified 23 to concerning his cleaning of the venting? 24 A Well, Mr. Cloud did testify that he could</p>

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<p style="text-align: right;">70</p> <p>1 only access certain areas, so there was certainly 2 some areas that he wouldn't have been able to 3 access. 4 In the method that he used to clean the 5 venting, he was not able to reach the whole thing, 6 and he didn't clean the venting by moving the dryer 7 away from the wall. 8 So it's -- it's certainly possible that 9 some of the -- some of the lint that we find in 10 some of the areas could have again moved there 11 after the fire. It may have been cleaner than it 12 actually was post-fire, if that makes sense to you. 13 Q Can you explain that? 14 A Yeah, I'll try my best. 15 Q Okay. 16 A So, you know, there's obviously lint on 17 the outside opening. He said he cleaned that, but 18 he had last cleaned it months before the fire. He 19 wasn't certain -- he didn't think he missed any 20 cleanings, but, you know, it's certainly possible. 21 The amount of usage that the family had 22 would certainly generate a fair amount of lint. 23 They used the dryer basically daily, so you would 24 have a greater accumulation of lint in this case</p>	<p style="text-align: right;">72</p> <p>1 front drum seal, and you concluded that -- I'm 2 sorry. Did you form a conclusion that there was an 3 air leak at the front drum seal of the Clouds' 4 dryer? 5 A Yes, I did. 6 Q And what do you base that opinion on? 7 A The remaining lint after the fire at the 8 front of the cabinet. 9 Q Could that lint have been the lint that 10 you're talking about in the front, that was on the 11 front left side of the cabinet? 12 A Yes. 13 Q Okay. Could that lint have accumulated 14 there for some other reason other than a seal leak? 15 A In conjunction with what we know about 16 the front drum seals in this particular dryer that 17 was manufactured in I think it was June of 2003, 18 this was definitely manufactured in a period where 19 electricals had front drum seal issues, and based 20 upon testing that we've done, we know that lint 21 accumulation is increased significantly when 22 there's a deficient front drum seal that's in a 23 dryer of this age. 24 Q So apart from the lint accumulated in the</p>
<p style="text-align: right;">71</p> <p>1 than certainly in someone who only used it once a 2 week, and lint can escape the dryer and pass 3 through the lint screen and get into the vent 4 system. 5 So it's obviously not super clean, but I 6 can't entirely say that Mr. Cloud wasn't entirely 7 correct, either. It's certainly likely that he 8 cleaned the venting once before the fire, to some 9 degree, anyway. 10 Q Do you have an opinion as to when that 11 cleaning might have been, the timeframe in terms of 12 when the fire happened? 13 A Just -- just his testimony that he 14 thought it was in September or October of 2013, a 15 couple months before the fire, three months before 16 the fire, two to three months before the fire. 17 Q Okay. On page 28 of your report, if you 18 want to turn to that section. I'm sorry I'm 19 jumping -- 20 A That's fine. 21 Q -- back and forth. I'll wait until you 22 get there. 23 So in this section of the report, you 24 make reference that -- you're talking about the</p>	<p style="text-align: right;">73</p> <p>1 left front of the dryer cabinet, was there any 2 other physical evidence to support the drum seal 3 leak? 4 MR. HUGHES: You said physical 5 evidence? 6 MS. YEMMA: Yeah, physical 7 evidence. 8 THE WITNESS: Well, certainly 9 the airflow through the dryer itself. 10 When -- when you have a front drum seal 11 leak, you typically get more lint 12 accumulated behind the drum because it's 13 one of the causes of reduced airflow. 14 So with the amount of lint we 15 have behind the drum and the heater pan 16 on the back of drum, the front drum seal 17 at minimum cannot be eliminated as a 18 potential cause for that. 19 And in addition to that, again 20 we're looking at the remaining lint 21 that's there. Of course, the front seal 22 itself was burned away completely, so we 23 couldn't examine that to see what 24 condition the front drum seal was in, but</p>

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<p style="text-align: right;">74</p> <p>1 I think -- and I'd have to look at maybe 2 some more detailed photographs. 3 I think there was some other 4 lint accumulation even after the fire 5 that was remaining around the drum flange 6 that also supported that, in addition to 7 the lint at the lower left of the 8 cabinet. 9 BY MS. YEMMA: 10 Q Did the -- were the Clouds experiencing 11 any, like, damage to clothing or missing buttons or 12 things like that? 13 A They weren't, but I don't know what they 14 were drying for clothing, if they dried a lot of 15 clothing with buttons or zippers. Just because 16 they didn't experience it doesn't mean that there 17 wasn't a problem with the front drum seal. 18 You know, the service bulletin -- the 19 technical service bulletins clearly state that 20 there was an issue with the front drum seal during 21 this period that affected all dryers manufactured 22 from the first week of 2002 until I think it's the 23 28th week or something of 2004. 24 Q Right.</p>	<p style="text-align: right;">76</p> <p>1 of the things in his file? 2 MR. HUGHES: Sure. 3 BY MS. YEMMA: 4 Q All right. So, Mike, during your 5 examination of the dryer in April of 2014, did you 6 examine the high limit safety thermostat? 7 A I did. 8 Q Okay. And what did you observe with 9 regard to the thermostat? 10 A The cap, what I refer to as the cap which 11 is like a phenolic plastic, was off of the high 12 limit switch when we received the dryer, which is 13 common due to the extensive fire damage we had 14 here. 15 And we tested the switch for operation, 16 but at that time, Electrolux's expert did not want 17 to open it up, which is our typical procedure. We 18 typically look at the contacts. It was my 19 understanding Mr. Crabtree did this later, but we 20 did not do it. 21 Q Okay. Did you have an opportunity to 22 look at the contacts after Mr. -- or at Mr. 23 Crabtree's inspection or after his inspection? 24 A Afterwards. I looked at the photographs.</p>
<p style="text-align: right;">75</p> <p>1 Did you see any evidence of -- you know, 2 did you see any buttons inside the dryer cabinet 3 during your examination? 4 A I don't recall seeing any buttons, no. 5 Q Okay. Did you see any evidence of any 6 foreign objects inside the dryer cabinet during 7 your examination, excluding what we've already 8 talked about in the venting? I'm just talking 9 about the cabinet. 10 A Sure. 11 MR. HUGHES: Do you want any 12 photos? 13 THE WITNESS: No, I'm just 14 looking here. I did not. 15 MS. YEMMA: Okay. 16 THE WITNESS: Actually, let me 17 just check my notes, just to be on the 18 side of completeness here. 19 No, I don't have any notations 20 of that, either, so I likely would have 21 written that down or taken photographs or 22 both. 23 MS. YEMMA: Pat, when we take a 24 break for lunch, can I get copies of some</p>	<p style="text-align: right;">77</p> <p>1 Q And what did you observe on the contacts? 2 A There was evidence that the high limit 3 had cycled in this dryer, which is not unexpected. 4 It's supposed to cycle. It's its job. 5 Q Okay. All right. So you didn't see any 6 evidence to suggest that the high limit wasn't 7 functioning as intended? 8 A No. We actually tested it with a heat 9 gun and a meter, and it did open and close as it's 10 supposed to, so that was operating properly, even 11 after the fire. 12 Q Okay. 13 A Even with the missing cap. 14 Q Okay. And in your report, you indicated 15 that -- you determined that the high limit had 16 operated repeatedly over the life of the dryer; is 17 that -- am I understanding your opinion correctly? 18 A Yes. It's very difficult to count or 19 even estimate the number of cycles from analysis. 20 It's kind of an unexact science, but -- but it had 21 operated repeatedly. 22 Q And was that significant to your analysis 23 of this matter and the cause of the fire? 24 A Only in a general sense that it showed</p>

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<p style="text-align: right;">78</p> <p>1 that there were periods where the dryer had 2 overheated over its approximately ten years of use. 3 Overheating is an indicator of poor 4 airflow, but it doesn't give any specifics of what 5 the airflow -- or poor airflow was caused by. It 6 can be any number of things or a combination 7 thereof. 8 But, again, as I said before, kind of 9 chuckling about it, these things are designed as a 10 safety. They're designed to be in place. They're 11 designed to operate. They're there to shut the 12 heater off. 13 So it's reasonable to expect some degree 14 of cycling in a dryer, even if it is experiencing 15 normal airflow from venting or other installation 16 issues, because people could occasionally forget to 17 clean their lint screen or dry a large load or 18 something that's bulky. 19 Q Okay. If you could turn your attention 20 to page 5 of your report. I am working in the 21 opposite direction. 22 A That's fine. We can go backwards. 23 Q Okay. Are you there? 24 A Yes.</p>	<p style="text-align: right;">80</p> <p>1 Q Yeah, absolutely. Here you go. 2 A Okay, sure, I did. I did see -- I did 3 see evidence of burning plastic escaping the 4 cabinet. 5 Q Okay. Could you identify or point me to 6 the photograph in that? It's Exhibit-4, right? 7 A Exhibit-4, yes. 8 Q Okay. 9 A So Image 4 on the first page shows the 10 exterior fire patterns that we have there. There's 11 a lot of oxidation, rusting on the outside of the 12 cabinet at the lower right front corner. 13 That's consistent with the fuel load of 14 the plastics burning inside which can burn away the 15 paint from the inside, but there's a seam right 16 there, and based upon testing we've done in 17 conjunction with looking at this fire pattern, just 18 this pattern alone says, you know, more probably 19 than not there were flames escaping this front 20 panel seam at the right side, so that would be 21 Point No. 1. 22 Q Okay. 23 A Image 199 shows the front panel dropped 24 on the front of the dryer, and it shows the remains</p>
<p style="text-align: right;">79</p> <p>1 Q So above the bullet points, the 2 paragraph, it starts out, "This fire event." Do 3 you see that? 4 So I'm -- okay. So I'm going to read the 5 sentence. It's the third sentence. "The design is 6 also defective because of its failure to confine 7 the fire within the appliance, as the use of 8 plastic components assists in communicating fire 9 out of the appliance where it can ignite 10 surrounding combustibles." 11 My question is, did you see any evidence 12 that the plastics in the dryer had escaped the 13 dryer cabinet? 14 A We know the fire escaped the dryer 15 cabinet, and the plastics were the fuel for the 16 fire because the load was removed, so, therefore, 17 the cause of fire escaping is the combustible 18 plastics. 19 Q Okay. But my question was, did you see 20 any evidence of the molten plastic escaping the 21 drum? 22 A I'll have to look at the photographs. 23 Q Okay. 24 A Can I?</p>	<p style="text-align: right;">81</p> <p>1 of the plastic from that right front corner, and 2 looking at the fire patterns on the interior of the 3 front panel, but more specifically on the lip, the 4 lower lip of the front -- of the -- sorry -- of the 5 cabinet, there is some oxidation and burn patterns 6 there that indicates there was burning material 7 seeping through that seam. 8 Then there's also kind of other views are 9 shown in that same area, in 242, and then 243 also 10 shows the melting plastic that is kind of 11 overhanging that whole lip. 12 Q You said 242 and 243? 13 A Yes. 14 Q Okay. 15 A And then Photo 277 just shows what's left 16 of the plastic for the blower housing at the right 17 front corner and what's left of the trap duct, and 18 it's been almost completely consumed in that area. 19 And when we've done testing on dryers 20 that looked like this after the fire, in most 21 cases, we find that the molten plastic has dripped 22 out between that front panel seam and the main 23 cabinet. 24 Q Have you examined Electrolux-manufactured</p>

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<p style="text-align: right;">82</p> <p>1 dryers that have been involved in a fire where 2 you -- where the plastics were contained to the 3 cabinet? 4 A Just -- 5 MR. HUGHES: Object to form. 6 THE WITNESS: Can you explain 7 your question a little better? 8 MS. YEMMA: Sure. 9 THE WITNESS: You're talking 10 about a small level fire? 11 BY MS. YEMMA: 12 Q Well, I want to know if there have been 13 any fires that you've examined involving an 14 Electrolux dryer where the plastics remained within 15 the cabinet. 16 A Yes, yeah, in smaller fires where the 17 fire has been discovered early and extinguished, 18 there is -- there is times where the plastic won't 19 necessarily escape the cabinet. 20 And in the cases of -- specifically I'm 21 recalling a laundry center where the fire was so 22 small, it was extinguished so quickly, that really 23 the only thing that burned up was the foam seal 24 between the trap duct and the blower housing, and</p>	<p style="text-align: right;">84</p> <p>1 her daughter came and closed it or whatever, but I 2 do know that the dryer door was closed throughout 3 the fire, anyway. 4 If there was -- if there was a period it 5 was open, I just don't know how long it was open 6 for, but it was -- the fire patterns on the inside 7 of the door say that the door was -- was closed; if 8 not latched anyway, at least closed. 9 Q Could the fact that Mrs. Cloud opened the 10 door after the fire was -- after the fire had 11 started -- could that have assisted with the fire 12 escaping the drum, in your opinion? 13 A Well, when she discovered the fire, it 14 was down below the drum, so by the time she removed 15 the clothes, it's -- again, I don't know when the 16 door was closed, if it was immediately after she 17 removed the clothes or when, but certainly the door 18 was closed during the fire, so I don't really 19 understand your question. It's kind of an 20 incomplete hypothetical. 21 Q Okay. Did you have the opportunity to 22 see the clothes? And I'm saying clothes. I think 23 they were clothes that were in the -- that were 24 being dried at the time of the fire. Do you know</p>
<p style="text-align: right;">83</p> <p>1 there was only a little bit of -- when I say -- 2 I'll say melting, but when I say melting, I just 3 mean deformation, not actual holes being melted in 4 the plastic or anything. It just kind of drooped 5 on the top of the blower housing. 6 That's a specific example I can think of, 7 but, again, the plastics in the laundry centers are 8 different from the freestanding materials -- 9 Q Right. 10 A -- freestanding dryer materials. 11 Q Do you have an opinion as to whether the 12 dryer -- strike that. 13 So it's my understanding that when the 14 Clouds were alerted to the fire, Mrs. Cloud opened 15 the dryer door, and she removed the materials from 16 the dryer. Is that your understanding of what 17 happened after the fire? 18 A Yes. That's her testimony from her 19 deposition, and it's also supported by the physical 20 evidence. 21 Q And then did she leave -- did she leave 22 the dryer door open after she pulled the material 23 out of the drum and put it on top of the dryer? 24 A I don't know if she left it open or if</p>	<p style="text-align: right;">85</p> <p>1 one way or the other? 2 A It was reported that they were her 3 daughter's clothes, but I did not see them. 4 Q Do you know if they -- have you seen any 5 photographs of them? 6 A I don't -- I don't recall. Yeah, I may 7 have, but I just -- I don't recall specifically. 8 Q Do you know if they -- do you know if 9 they were fire-damaged in any way? 10 A I don't know that. 11 Q Do you know if the clothes were dry when 12 she took them out of the drum? 13 A According to her testimony, they were. 14 She specifically commented to her daughter that 15 when they first discovered the smell or odor of 16 smoke or whatever it was that alerted them to the 17 fire, she thought the dryer had just burned out, as 18 she said, like, stopped working, and then she made 19 a comment to her daughter, "Well, at least you 20 finished" -- "at least your clothes were dry," and 21 then it was only thereafter that they actually 22 discovered the flames below the drum in the trap 23 duct area. 24 Q Mike, it's my understanding, and we</p>

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<p style="text-align: right;">86</p> <p>1 talked -- we mentioned this early in your testimony</p> <p>2 that you have done -- you have done testing on the</p> <p>3 plastic components in the Electrolux dryer; is that</p> <p>4 right?</p> <p>5 A We have.</p> <p>6 Q Okay. And that was testing done -- I'm</p> <p>7 just getting to that part of your report. Sorry.</p> <p>8 Okay. You refer to that as the component</p> <p>9 burn testing that was done in October of 2013?</p> <p>10 A Yes.</p> <p>11 Q Okay.</p> <p>12 A That was not just plastics from</p> <p>13 Electrolux dryers, but also -- well, it was</p> <p>14 alternative materials as well.</p> <p>15 Q Okay. And I was going to ask you if you</p> <p>16 could -- the testing that was done in October of</p> <p>17 2013, was there a protocol for that, a written</p> <p>18 protocol for that testing?</p> <p>19 A I believe so, yes.</p> <p>20 Q Okay. And is that on the hard drive?</p> <p>21 A Yes. If it -- I'm almost 100 percent</p> <p>22 certain we produced written protocols for that, and</p> <p>23 it would be on the hard drive.</p> <p>24 Q Was that testing that you were personally</p>	<p style="text-align: right;">88</p> <p>1 what do you mean by that?</p> <p>2 A Well, essentially we were doing the</p> <p>3 testing in conjunction with him, even though he's</p> <p>4 relatively close to us, just like a scheduling</p> <p>5 issue. He wants to be there if he could, but I</p> <p>6 think that he wasn't able to, so we just had to</p> <p>7 share the data with him afterwards.</p> <p>8 Q So he -- my next question was going to</p> <p>9 be, so he wasn't present, physically present, for</p> <p>10 the testing that you conducted?</p> <p>11 A That's correct. Yeah, he was not there.</p> <p>12 Q Okay. And who conducted the testing?</p> <p>13 A Myself and Mr. Parsons, and then we would</p> <p>14 have had some other stuff there, lab stuff, and</p> <p>15 probably our IT person doing some video stuff.</p> <p>16 Q Did the testing last more than one day?</p> <p>17 A I don't recall, but I might be able to</p> <p>18 tell. What page was that?</p> <p>19 Q 160.</p> <p>20 A I don't recall. The only other way to</p> <p>21 really find that out would be for me to go through</p> <p>22 the hard drive.</p> <p>23 Q Do you have a recollection as you sit</p> <p>24 here today? Was it something that lasted multiple</p>
<p style="text-align: right;">87</p> <p>1 involved in?</p> <p>2 A Yes.</p> <p>3 Q Who drafted the protocol for that</p> <p>4 testing?</p> <p>5 A I think it was drafted in conjunction</p> <p>6 with Mr. Parsons and myself, and I believe Mr.</p> <p>7 Fallows may have even had some input on the</p> <p>8 protocol.</p> <p>9 Q Okay. Anybody else? Just the three of</p> <p>10 you that you just mentioned?</p> <p>11 A Not that I recall. I mean, there may</p> <p>12 have been someone at our office that may have also</p> <p>13 been involved, maybe lab technicians that were</p> <p>14 assisting or something, but primarily it was Mr.</p> <p>15 Parsons and myself.</p> <p>16 Q What was the contribution that Mr.</p> <p>17 Fallows made to the protocol?</p> <p>18 A Well, we were working on him -- working</p> <p>19 with him on another case at the time, so I know he</p> <p>20 wanted to be involved in the testing itself, or at</p> <p>21 least see the results of the testing. I don't</p> <p>22 specifically recall any conversations about the</p> <p>23 protocol, though, so I just don't know.</p> <p>24 Q When you say he wanted to be involved,</p>	<p style="text-align: right;">89</p> <p>1 days?</p> <p>2 A It may have been, like, two days. I</p> <p>3 don't think it was, like, a week of testing or</p> <p>4 anything. It may have been a couple days apart,</p> <p>5 only because of just our own schedules or the</p> <p>6 materials we were using.</p> <p>7 I think we had to order some parts and</p> <p>8 stuff to do it with. They may have come at</p> <p>9 different times. The photographs that we took</p> <p>10 would be on the hard drive, and they would have</p> <p>11 dates associated with those, so that would be the</p> <p>12 best, most reliable way to tell.</p> <p>13 Q We can look at that. That's fine.</p> <p>14 Can you tell me what the test entailed?</p> <p>15 A Sure. The testing was trying to figure</p> <p>16 out what types of materials were used in different</p> <p>17 dryers and their contributions to a fuel load in a</p> <p>18 dryer or the benefits to fire safety I guess is the</p> <p>19 best summary.</p> <p>20 Q How did you -- how was the testing</p> <p>21 carried out?</p> <p>22 A Again, we used the protocol. We</p> <p>23 certainly used a Bunsen burner as the fuel source</p> <p>24 or as the heat source, I mean, to ignite different</p>

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<p style="text-align: right;">90</p> <p>1 materials, and we tested them to see, you know, how</p> <p>2 they behaved with the application of flame for a</p> <p>3 very short period of time or for repeated</p> <p>4 applications or full duration.</p> <p>5 Q Okay. So the materials that you used,</p> <p>6 can you describe them for me?</p> <p>7 A Sure. We used a trap duct out of a</p> <p>8 standard Frigidaire style dryer. Again, I think it</p> <p>9 was probably an individual component that was</p> <p>10 purchased from a parts store or something.</p> <p>11 That's what we refer to as the HB</p> <p>12 plastic, which means it's been tested for flame</p> <p>13 spread, but generally HB plastics don't have any</p> <p>14 flame retardants, or at least they're not qualified</p> <p>15 as self-extinguishing plastics, anyway.</p> <p>16 We tested a trap duct from a GE dryer</p> <p>17 manufactured by Electrolux, which is a -- I'm</p> <p>18 trying to remember off the top of my head if it's a</p> <p>19 5VA or a 5VB plastic, but it is a flame-retardant</p> <p>20 self-extinguishing plastic that they used in those</p> <p>21 specific models.</p> <p>22 And then we tested a -- we tested a metal</p> <p>23 air duct or trap duct out of a Whirlpool or a</p> <p>24 Maytag dryer. We also did some tests to the blower</p>	<p style="text-align: right;">92</p> <p>1 short period of time. I think it was two seconds</p> <p>2 or five seconds or whatever it was, and we would</p> <p>3 pull the flame away, and if it's a flame-retardant</p> <p>4 plastic, it wouldn't ignite as easily as a</p> <p>5 non-flame-retardant plastic, and if it was</p> <p>6 self-extinguishing, once you take the flame away</p> <p>7 and you remove the heat source, it should</p> <p>8 self-extinguish.</p> <p>9 Q So I just want to make sure I got all the</p> <p>10 parts. So the last part we were talking about was</p> <p>11 the impeller wheel.</p> <p>12 Were there any other -- we talked about</p> <p>13 the trap ducts, the blower wheel, the blower</p> <p>14 housings, and the impeller wheel. Anything else</p> <p>15 that was tested?</p> <p>16 A That last impeller wheel, I'm</p> <p>17 specifically talking about from another -- again, a</p> <p>18 Whirlpool, Maytag, whatever we used for, like, the</p> <p>19 alternative materials.</p> <p>20 No, as far as the component -- the flame</p> <p>21 testing or fire testing for components, I think</p> <p>22 that's all we used. Again, I'd have to</p> <p>23 double-check through all the photographs of the</p> <p>24 testing on the hard drive, but you have them.</p>
<p style="text-align: right;">91</p> <p>1 wheels and the blower housings as well.</p> <p>2 Q So the blower wheels and the blower</p> <p>3 housings, what -- what were they made of?</p> <p>4 A I'm trying to remember the exact details.</p> <p>5 I'd have to go through the hard drive to look at</p> <p>6 the photographs and see, but it's my recollection,</p> <p>7 anyway, that the Electrolux blower housing and the</p> <p>8 blower wheels that we used were standard current --</p> <p>9 when I say "current," currently available at the</p> <p>10 time we purchased them, anyway -- HB plastics.</p> <p>11 And then we did test some type of</p> <p>12 impeller wheel and maybe even a metal blower</p> <p>13 housing from a Whirlpool dryer or Maytag dryer or</p> <p>14 something.</p> <p>15 Q Was the impeller wheel -- what was that</p> <p>16 made of?</p> <p>17 A That particular impeller was some type of</p> <p>18 flame-retardant plastic. I don't think we can</p> <p>19 determine exactly what the rating was, but it did</p> <p>20 contain some flame retardants and</p> <p>21 self-extinguished.</p> <p>22 Q How were you able to figure that out?</p> <p>23 A Just by the test itself. The methodology</p> <p>24 was we would apply the flame for a very specific</p>	<p style="text-align: right;">93</p> <p>1 MR. HUGHES: Off the record for</p> <p>2 a second.</p> <p>3 (At this time, a discussion was</p> <p>4 held off the record.)</p> <p>5 BY MS. YEMMA:</p> <p>6 Q Mike, we took a short lunch break.</p> <p>7 Before we took that break, we were talking about</p> <p>8 the testing you had done on the -- the burn testing</p> <p>9 on the component parts, so I'd like to just stick</p> <p>10 with that for a while longer.</p> <p>11 A Sure.</p> <p>12 Q So you had identified the parts that were</p> <p>13 used in that testing. Could you tell me -- and I</p> <p>14 understand that you used a Bunsen burner as the --</p> <p>15 as the flame to conduct the test, right?</p> <p>16 A Yes, as the heat source.</p> <p>17 Q As the heat source.</p> <p>18 Okay. Can you tell me how that test was</p> <p>19 carried out?</p> <p>20 A Again, I'd have to look at the protocol</p> <p>21 that we have on the hard drive and the photographs</p> <p>22 to really look at specific details, but generally</p> <p>23 from what I recall, we took each component and we</p> <p>24 subjected them for a period of time that the Bunsen</p>

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<p style="text-align: right;">94</p> <p>1 burner flame was aimed against the -- essentially a 2 horizontal orientation against the item, and we 3 would shut off the -- shut off the fuel to the 4 Bunsen burner to extinguish the flame after a 5 certain period of time and make observations. 6 We did that a couple times, and depending 7 on what happened, if the -- if the material kept 8 burning by itself once the flame was extinguished, 9 then we'd make those observations and be able to 10 establish that it was not self-extinguishing 11 plastic. 12 If it self-extinguished after the short 13 duration flames, we left the flame on the entire 14 time to see what would happen and how it would 15 burn. 16 Q With -- how did you decide how long to 17 apply the flame to the component? 18 A It was just a timeframe that myself and 19 Mr. Parsons chose, and I forget whether -- I think 20 it was five seconds is what we used. It was just 21 enough that it would be, in the case of a plastic 22 that had no flame retardants, enough heat energy to 23 ignite it, yet not enough to keep it burning for 24 any long duration obviously, unless it continued to</p>	<p style="text-align: right;">96</p> <p>1 duct, it ignited the plastic within seconds, and 2 when the flame on the Bunsen burner was 3 extinguished, the fire continued to burn, and the 4 plastic which was supported in an orientation kind 5 of similar to it being in the dryer in a regular 6 vertical orientation continued to burn for I think 7 it was, like, 40-something minutes until basically 8 all the plastic was consumed and all that was left 9 was some residue. 10 Q Okay. So in what orientation was the 11 trap duct when the flame was applied to it? 12 A It was -- it would be best to probably 13 show a photograph, but it was standing upright kind 14 of like it would be as it would sit here to the 15 front panel of the dryer. 16 Q Do you mind if we pull those photographs 17 up? It might be helpful. 18 A I don't mind at all. 19 Q Do you want to use -- 20 A We can use yours. 21 MR. HUGHES: Just off the 22 record. 23 (At this time, a discussion was 24 held off the record.)</p>
<p style="text-align: right;">95</p> <p>1 burn, so then it burned to completion in some 2 cases, in some of the testing. 3 Q The components that you were testing, 4 were they on a table, or were they on the ground? 5 A We were testing them on a piece of cement 6 board under our burn hood. 7 Q Was the test conducted outside? 8 A No, it was inside, in our building, yes. 9 Q You had the hood? 10 A Yes. 11 Q Got it. 12 A Yeah, we have a smoke hood that removes 13 the smoke from the building. 14 Q So do you recall what happened when the 15 HB plastics were -- when the flame was applied to 16 the HB plastics? 17 A Generally, yes. 18 Q Okay. And what do you recall? 19 A The first exposure of the short duration 20 flame ignited the -- at least the trap duct, 21 anyway. 22 I don't remember if we -- what exactly 23 happened with the air duct -- I'm sorry -- the 24 blower housing, not the air duct; but the trap</p>	<p style="text-align: right;">97</p> <p>1 BY MS. YEMMA: 2 Q Mike, we took a short break, but with 3 regard to your file, any handwritten notes that you 4 have, would they be contained in the physical file 5 that you brought? 6 A Yes. 7 Q Okay. And you mentioned about the dep 8 summaries. I noticed that there was a dep summary 9 of Emil and Sharon Cloud. Are those incorporated 10 into your report? 11 A Yes, those are. 12 Q And did you -- what other depositions did 13 you review in connection with this matter besides 14 the Clouds'? 15 A I reviewed a bunch of depositions. There 16 was obviously a lot more that were produced for a 17 bunch of cases kind of together, Brian Ripley and 18 Mike Ricklefs, and, geez, I'm trying to think of 19 all of them, Shelly Clausen and Ali Zarghami. 20 There's a bunch of depositions that I'm 21 generally familiar with that are probably relevant 22 to all these cases, but specifically in the Cloud 23 case, the ones that were produced was Emil and 24 Sharon Cloud, the fire marshal, Michael Johnson,</p>

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<p style="text-align: right;">98</p> <p>1 Carl King, Fred Pauk, P-A-U-K, and Dave Fuller. 2 Those are the depositions specific in this case 3 that I reviewed. 4 Q Okay. Thanks. 5 Now, we can go back to the burn testing. 6 So we plugged in your hard drive, and you pulled up 7 a folder, so it's in Electrolux, Electrolux 8 testing, plastic component, fire testing, October 9 2013. Did I read that correctly? 10 A Yes. 11 Q And that's just the folder structure to 12 get to what you pulled up, so there are three 13 folders, blower fan test, trap duct/air duct, fire 14 test. 15 Okay. So before we pulled up the hard 16 drive, we were talking about the trap duct test? 17 A Yes. 18 Q Is that correct? 19 Okay. So if you would, I believe my 20 question which prompted us to pull out the hard 21 drive was asking about the orientation of the trap 22 duct during the testing. 23 A Sure. I can show you photographs. 24 Q That's great. Thanks.</p>	<p style="text-align: right;">100</p> <p>1 that the flame was placed? 2 A Well, sure. It's the flame from the 3 Bunsen burner. Again, the Bunsen burner is set in 4 a horizontal fashion, so it's directing flame 5 towards the vertical interface of the trap duct. 6 Q Okay. And -- 7 A And there's measurements to show how high 8 it was and where it was in relation to the burner. 9 I just want to check one thing. 10 Q Sure. 11 A Because of the PDF size, I can't read it. 12 We did write in permanent marker as to which trap 13 duct we're testing here. I'd have to look at the 14 videos to figure out which one it was because I 15 can't read it. The PDF is just too grainy. 16 Q When you say which -- you mean whether it 17 was the HB or the 5V? 18 A Yeah. I think one -- this might be the 19 GE 5V one because I think it says GE on it. Like, 20 it looks more like it says GE than it does HB, but 21 I can't tell. I'd have to look at the video, but 22 we can do that, too, if you want. 23 Q Okay. Did you set up the trap duct in 24 the same orientation for the 5V and the HB?</p>
<p style="text-align: right;">99</p> <p>1 A For the air duct/trap duct, we did three 2 different tests. One was the HB plastic, one was 3 the 5V plastic from the GE models, and then one was 4 a metal alternative duct. 5 Q Okay. 6 A So the first one is the HB duct, I 7 believe. 8 Q It's going to take a minute to pull up in 9 that program. 10 A Sure. 11 Q Okay. So that's a four-page document? 12 A Yeah, four pages with four photos per 13 page, and there's also -- there was video taken 14 with this, too. 15 Q I think if you click more to the right. 16 A I'll let you. It's your computer. 17 Q I should have brought a mouse. Okay. 18 A Okay. So -- 19 Q There you go. You're at an awkward 20 angle. 21 A So Photo 4 is probably the best 22 representation of the way the air duct was set up. 23 Q Okay. And can you describe, and if you 24 could refer to the photograph where on the duct</p>	<p style="text-align: right;">101</p> <p>1 A Yeah, because they're the same trap duct. 2 They're molded from the same mold. Dimensionally, 3 they're the same. We did the exact same setup of 4 that test. 5 When we did the alternative component 6 from the Whirlpool or Maytag -- I think it was a 7 Whirlpool -- which was a metal trap duct, that 8 one's a little bit different arrangement. 9 So we just tried to make it similar as 10 far as the height of the Bunsen burner and the 11 distance away from the surface that we were trying 12 to ignite. 13 Q So when the 5V trap duct -- when you 14 performed the test, what happened? 15 A So the 5V one is the trap duct that is 16 made of a self-extinguishing flame-retardant 17 plastic. 18 When we did the -- what's called the 19 momentary flame test where we put the test -- 20 sorry -- put the flame to it for, like, whatever, 21 five seconds, and removed it, the fire immediately 22 self-extinguished, unlike the HB one where it just 23 continued to burn. 24 Because it did that and</p>

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<p style="text-align: right;">102</p> <p>1 self-extinguished, we reapplied the flame again for 2 another duration. I think we did it longer the 3 second time. I think it was, like, ten seconds, 4 and it burned when the flame was impinging directly 5 on the plastic, but again, as soon as we shut the 6 fuel off on the Bunsen burner, it 7 self-extinguished. 8 The last part of the test was to leave it 9 exposed to continuous flame, and we put the Bunsen 10 burner again in the same spot. We put it on and we 11 left it on. 12 With the heat constant to it, it was able 13 to burn a portion of the plastic, when the heat was 14 constantly exposed to it, but as soon as the 15 plastic around the flame burned away or melted 16 away, however you want to describe it, the rest of 17 the trap duct stayed intact, so basically we burned 18 a hole through it, whereas opposed to the HB 19 plastic upon the first momentary ignition, it 20 burned and continued to burn until there was 21 nothing left but a very small puddle of ash. 22 Q So the amount of time that you were 23 exposing the flame to the components, is that 24 documented in the videos?</p>	<p style="text-align: right;">104</p> <p>1 is. 2 Q How about the 5V trap duct? How did you 3 obtain that? 4 A Same thing. 5 Q So what happened with the metal trap duct 6 when you applied the flame? 7 A The metal trap duct, we did the exact 8 same process just to stay with the consistency, but 9 the momentary flame discolored the steel. 10 Again, that's a coated steel, so some of 11 the galvanization or whatever coating they had on 12 there was discolored or burned off a little bit, 13 but there was -- there was no ignition of the metal 14 and no -- no flames beyond that which the Bunsen 15 burner itself was producing. 16 But we did repeat the test, and we put 17 that on there for a duration and then a longer 18 duration, and then a long enough duration that you 19 can get the point that metal doesn't burn. 20 Q Okay. So -- and I know we have a video 21 documenting it, and the photographs. Did you take 22 any notes during the test? 23 A I don't think so, no. 24 Q Did Ron take any notes, Mr. Parsons?</p>
<p style="text-align: right;">103</p> <p>1 A It is, yes. 2 Q Okay. 3 A And we -- in the case of the GE trap 4 duct, the 5V trap duct, we kept the flame exposed 5 until basically the plastic itself was no longer 6 burning, so, like, when the smoke and everything 7 else stopped, because eventually, like I said, it 8 burned a hole around the flame where the flame 9 wasn't touching anything anymore. 10 Q How long did that take? Do you recall? 11 A I -- we'd have to look at the video. It 12 was -- it was -- compared to the total burning of 13 the HB duct, which was, like, 40 minutes to an 14 hour, somewhere around there, I think the other 15 H -- sorry -- the 5V trap duct only burned for, 16 like, five or ten minutes maybe before it burned a 17 hole through the plastic and the rest of it 18 self-extinguished. 19 Q So the trap duct, the HB trap duct, how 20 did you obtain that? 21 A We ordered it from a -- from a parts 22 store. It's a factory Electrolux part you get off 23 a parts diagram and ordered it from either Sears 24 Parts Pros or Appliance Parts Pros or whatever it</p>	<p style="text-align: right;">105</p> <p>1 A No, I don't think we took any real notes. 2 I think it was fairly self-explanatory through the 3 photographs and video. 4 Q Got it. 5 So if we could look at the photographs 6 for the blower wheel and the blower housing. 7 A Sure. 8 Q If you could pull that up. 9 A Did you want to see the metal duct 10 because it's different, trap duct? 11 Q Sure. If you can pull that, that's 12 great, Mike. 13 A Well, Test 3 is the metal. 14 Q Okay. And you said this came from a 15 Whirlpool dryer? 16 A I believe it was a Whirlpool, yeah. 17 Q Do you know what year manufacture for the 18 Whirlpool dryer? 19 A Not offhand, no. I can probably figure 20 it out, but I would have to estimate it was 21 probably a 2007, 2008 dryer. 22 Q Okay. 23 A I mean, they use -- they use metal ducts 24 on their dryers, at least this style of dryer which</p>

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<p>1 has the front mounted screen. It uses a front trap</p> <p>2 duct. They have been using this design since,</p> <p>3 like, the mid-2000's.</p> <p>4 Q Okay. So if we could -- thank you for</p> <p>5 pulling that up.</p> <p>6 So let's look at the plastic, the HB, 5V</p> <p>7 blower wheel and blower housing.</p> <p>8 A So first we'll look at the blower fan.</p> <p>9 Q Okay.</p> <p>10 A That's Test 6 and 7, and Test 6 would be</p> <p>11 the Whirlpool fan.</p> <p>12 Q Okay. And that consisted of what</p> <p>13 material?</p> <p>14 A That would be some type of</p> <p>15 flame-retardant. I don't know if it's 5V or V0,</p> <p>16 but it's something greater than an HB.</p> <p>17 Q Okay. And then Test 7 was the HB blower</p> <p>18 fan?</p> <p>19 A Yeah. Let me just double-check that.</p> <p>20 Right. Test 7 would be the Electrolux</p> <p>21 fan, which would be HB as far as -- as far as our</p> <p>22 understanding goes.</p> <p>23 Q So describe to me what you did to test</p> <p>24 the HB blower fan.</p>	<p>1 what we've been told by Electrolux, and the way it</p> <p>2 behaved, too, as well.</p> <p>3 Q And how did it behave when it was exposed</p> <p>4 to the flame?</p> <p>5 A Same thing as all the other components</p> <p>6 did. Now, this is the assembly, so it had the fan</p> <p>7 and the blower housing together on this one because</p> <p>8 we got it as a one-piece unit, the part, but it</p> <p>9 ignited -- it ignited the --</p> <p>10 Q You have to then click on the photo.</p> <p>11 There you go. Sorry.</p> <p>12 A That's just a factory marking.</p> <p>13 Q I can't read that, either.</p> <p>14 A We have the original photo. We don't put</p> <p>15 the original photos on the hard drive because it</p> <p>16 just takes up too much space. We have those back</p> <p>17 at the office if we have a need to look at those</p> <p>18 specifically. You can ask for the originals if you</p> <p>19 ever need them.</p> <p>20 Q So with regard -- so then Test 5 would</p> <p>21 have been -- was -- what was Test 5?</p> <p>22 A Let me just make sure.</p> <p>23 Q Yeah, sure.</p> <p>24 A So Test 5 is another Electrolux blower</p>
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<p>1 A Same protocol. It would be the short</p> <p>2 duration, a little bit longer duration, and then</p> <p>3 full duration.</p> <p>4 Q So what happened with the short duration?</p> <p>5 A Substantially similar. The HB model</p> <p>6 caught immediately, basically burned to completion,</p> <p>7 and the Whirlpool, some type of flame-retardant</p> <p>8 plastic was self-extinguishing, so it would put</p> <p>9 itself out and have difficulty burning. It would</p> <p>10 only burn where the flame was.</p> <p>11 Q Did you do the same -- like what you did</p> <p>12 with the trap duct? Did you expose the component</p> <p>13 to the flame for --</p> <p>14 A It was the same exact test protocol, same</p> <p>15 duration or pairs of durations or whatever it was.</p> <p>16 Q Okay. So let's look at the blower</p> <p>17 housing photographs.</p> <p>18 A So those would be Tests 4 and 5.</p> <p>19 Q So Test 4 -- I know you're pulling it up.</p> <p>20 Sorry.</p> <p>21 A So Test 4 was the blower assembly from an</p> <p>22 Electrolux.</p> <p>23 Q Okay. And that consisted of HB plastic?</p> <p>24 A Yes, again, from our understanding, from</p>	<p>1 housing -- or blower assembly, should I say,</p> <p>2 because it again has the impeller inside of it, so</p> <p>3 I don't know if one of these was -- we were</p> <p>4 wondering if it was HB and one wasn't.</p> <p>5 The reason why I say that, and I'm just</p> <p>6 trying to remember the details, is Electrolux was</p> <p>7 making their bulkhead dryers, the ones from Juarez,</p> <p>8 Mexico, to meet the 2013 fire containment standard</p> <p>9 using -- we were wondering if they were using</p> <p>10 different materials, so that's why we tested two</p> <p>11 different ones.</p> <p>12 So one of these blower housings would</p> <p>13 have been from a ball-hitch dryer. One of them</p> <p>14 would have been from a very current bulkhead dryer.</p> <p>15 Q Okay. And did you make a determination</p> <p>16 as to the type of plastic that made up the blower</p> <p>17 housing in the bulkhead?</p> <p>18 A I have to look at the videos. Do you</p> <p>19 mind if I watch the videos?</p> <p>20 Q Yeah, sure.</p> <p>21 A I apologize. It's been a long time since</p> <p>22 we did these tests, so I don't remember all the</p> <p>23 details.</p> <p>24 Okay. Yeah, so Test 4 was a -- some type</p>

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<p style="text-align: right;">110</p> <p>1 of flame retardant, whether it be V0 or 5V or 2 something blower housing, but with an HB fan 3 impeller, and Test 5 was HB blower housing and HB 4 fan impeller. 5 And the difference in the two tests were 6 that much as a chain is only as good as its weakest 7 link, when we tested the blower housing that was 8 made of some type of flame-retardant plastic, the 9 short duration flame didn't catch the blower 10 housing itself on fire easily, but once the 11 impeller caught fire, that continued to free burn 12 and served as the heat energy and fuel that burned 13 most of the flame-retardant plastic, whereas in 14 the -- in Test 5 where both components were HB, the 15 outer blower housing ignited at the first duration 16 test, and then that caught the impeller on fire, 17 and the whole unit burned 100 percent, whereas Test 18 4, there was still some remains of the -- at the 19 left side of the blower housing where the fan 20 impeller hadn't had a chance to burn up that 21 material. 22 Q Okay. So we've covered Tests 1 through 23 7. Does that comprise all of the testing for 24 the --</p>	<p style="text-align: right;">112</p> <p>1 test we were just discussing, while there is a 2 minor improvement in the use of the blower assembly 3 by using a 5V outer blower housing, the fact that 4 they kept the fan impeller as HB still made that 5 fail pretty significantly because that supplied the 6 heat energy to drive off the fire inhibitors and 7 prevent that 5V plastic, or whatever rated plastic 8 it was, to self-extinguish. 9 Q And that was after the short duration 10 exposure or the -- well, how long was the exposure 11 for that? 12 A Let me just look at that video again. 13 You're specifically talking about the blower 14 assembly? 15 Q The blower assembly that you believe was 16 from an Electrolux bulkhead dryer, right? 17 A Correct. 18 So this is after the first short 19 duration. You can see it just blackened the 20 outside. 21 Q Can you just identify that photograph? 22 A It's a video. It's Test 4 video. 23 Q Test 4 video. That's perfect. Okay. 24 A And so, again, we ran that for a very</p>
<p style="text-align: right;">111</p> <p>1 A For the component itself, yeah. 2 Q What conclusions, if any, did you draw 3 from that testing that are relevant in this case? 4 A Well, metal doesn't add any fuel to the 5 fire. Metal doesn't burn, so metal was the 6 superior behaving material for the components. 7 The 5V plastic would self-extinguish as 8 long as the heat source was not present, so in 9 conditions where you have a dryer fire that had a 10 load that was burning or a lot of lint in the trap 11 duct or something that was burning, that may 12 continue to ignite those materials and keep it 13 burning at least on a component level, anyway. 14 It was certainly improved over the HB 15 material because it had that ability to 16 self-extinguish, and HB material performed the 17 worst. 18 It just took very little heat energy to 19 ignite it, and it continued to burn to completion. 20 There was dripping flaming plastic that came out of 21 that, whereas the 5V material, there's no -- it may 22 melt, but there's no dripping flaming particles 23 that are emitted from that material. 24 And then specifically in regards to this</p>	<p style="text-align: right;">113</p> <p>1 short duration, like, five seconds on, and then we 2 shut the burner off, and what it did is it just 3 kind of charred and left a soot stain on the 4 outer -- excuse me -- the 5V outer housing, 5 whatever, flame-retardant outer housing. It didn't 6 ignite the impeller on the short duration test. 7 And then we hit it again, and on the 8 second short duration test, I believe it ignited 9 the impeller, and then we shut off the burner 10 partway through. 11 I think another -- let me go into another 12 video. There's two different angles. One actually 13 shows it at an angle so you can actually see the 14 flame on the burner. 15 This is Camera 2, so here you can see 16 the -- okay. I can actually see the markings here, 17 so we did write that it was an EHP, for Electrolux 18 Home Products, 5V. Again, we think it's 5V, but I 19 don't know if I've ever seen what they use on the 20 new bulkhead dryers. 21 Q And I understand you're inferring, based 22 on how the plastic behaved when exposed to the 23 flame, what type of plastic it was? 24 A Yes.</p>

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<p style="text-align: right;">114</p> <p>1 Q But did you do anything else to confirm 2 what the plastics were that you used in the test? 3 A No. We thought about sending it out for 4 FTIR analysis to identify the plastics, but it 5 just -- it doesn't make a huge difference. We know 6 all the models, all the ball-hitch, have HB plastic 7 blower housings, at least the ones we deal with. 8 We know there was a period of time where 9 the GE models in the late '90's, early 2000's did 10 have HB plastic blower housings as well through a 11 very limited period of time just through deposition 12 testimony, so we're really only dealing with those 13 two types of materials in the subject dryers. 14 Q Okay. 15 A So this would be the first short duration 16 at two minutes. 17 Q Is there a count -- oh, I see. Okay. 18 A There is, down at the bottom, and then we 19 let it cool for, like, a minute after we do the 20 first short duration burn. 21 Q Were you consistent in how -- throughout 22 the test in terms of the timing? 23 A Yes. We followed the same protocol. 24 Q And this is the second duration?</p>	<p style="text-align: right;">116</p> <p>1 in relation to the flame itself will have some 2 variation to it because of its proximity to the 3 material and the shape of the flame itself, but I 4 would say probably around there somewhere. 5 Q And in the photographs, I think we saw it 6 earlier. 7 A There's the dripping of the flaming 8 plastic. 9 Q Got it. 10 You document the distance between the 11 burner -- the Bunsen burner, the nozzle for lack -- 12 I don't know if that's what you would call it. 13 A Right. 14 Q To the component; is that right? 15 A That's correct, yeah. 16 Q And is the Bunsen burner -- is it on? I 17 see, like, a -- it looks like the back of a cell 18 phone, but what is that? 19 A It's a weighted stand -- 20 Q Okay. 21 A -- just gripping the Bunsen burner so it 22 doesn't move. 23 Q Got it. 24 Okay. So, Mike, the dryer at issue in</p>
<p style="text-align: right;">115</p> <p>1 A Yeah. It should be a minute later. It 2 should be right about the three-minute mark is when 3 we did it, give or take when the video starts. 4 Q And what are we watching now, Mike? 5 A So this is the -- this is the second 6 flame test, essentially the second part of this. 7 Step 2 I guess is a better way to say it. 8 Q Of Test 4? 9 A Step 2 of Test 4, and the flame is 10 actually on for a period of time. The burner is 11 still lit, and it's been going for, say, 20 seconds 12 or so. 13 The -- the plastic fan impeller that's HB 14 has caught fire. You can actually see some 15 dripping and flaming plastic coming from the 16 material inside a little bit here and there, and 17 then the flickers of flame where the 5V plastic is 18 trying to self-extinguish even though the fire 19 inside is keeping it burning to some degree. 20 Q How hot is the flame from the Bunsen 21 burner? 22 A It's a blue flame, so it's probably in, 23 like, the 14, 1500-degree range, something like 24 that. We have to measure -- exactly where it was</p>	<p style="text-align: right;">117</p> <p>1 the Cloud matter, it's -- 2 A Let me shut this off. 3 Q Oh, sure. Maybe just, like, if you want 4 to keep the hard drive open in case we need to go 5 back to it later, I think that makes sense. 6 A That's fine. 7 Q So the Clouds' dryer was manufactured in 8 I think July of 2000 -- 9 A June or July. I can tell you in a 10 second. 11 Q Okay. 12 A June, June of 2003. 13 Q And it's a gas dryer, and it would have 14 been subject to the ANSI Z21.5.1 standard. You 15 agree with that? 16 A Yeah, I agree. 17 Q As part of your analysis of this matter, 18 did you find any reason to conclude that the dryer 19 wasn't manufactured and designed in accord with 20 that standard? 21 A Well, as far as the standard goes, it 22 specifies the minimum voluntary standards for gas 23 clothes dryers, residential style clothes dryers, 24 so as far as meeting the minimum standards, it's --</p>

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<p>1 for a gas dryer, anyway, I would say that it did 2 meet those minimum standards. 3 Electrolux does design all their 4 ball-hitch dryers to meet all standards, though, 5 because most of the components aside from the gas 6 burner versus the heating elements are universally 7 used in both the gas and electric models. 8 I -- I have some issues with the electric 9 dryer standard, whether this dryer met the electric 10 dryer standard, anyway, as far as instructions and 11 stuff goes, and then it would not be able to meet 12 the current UL 2158 electric dryer standards 13 because of the fire containment aspect. 14 Q And you did conduct fire containment 15 testing on -- 16 A I did. 17 Q And we'll get to that in a little while. 18 With regard to -- you made a comment that 19 with regard to 2158, you said that the instructions 20 don't comply, in your opinion? 21 A In my interpretation of the standards, 22 yes. It requires a more stringent explanation of 23 what the user service involves. 24 Q Have you formed any conclusion as to what</p>	<p>1 A That's correct. You can use plastics, 2 but, again, it's only the minimum voluntary 3 standards. Because each dryer design is different, 4 each manufacturer uses different components, that 5 does not mean it's a good design or a safe design. 6 I'm just saying that this is what you 7 just at least comply with, and in this particular 8 situation, since there were plastics in it, it was 9 certainly not a good design because it was the 10 primary source of fuel in this fire. 11 There was no load. The plastics are what 12 caused most of this damage and allowed the fire to 13 escape the cabinet. 14 Q Okay. Mike, I realize this is dependent 15 on what trial counsel asks you at trial, but do you 16 anticipate -- are you prepared to offer opinions 17 with regard to the warnings and instructions 18 associated with the Clouds' dryer? 19 A It depends on the level. Obviously Dr. 20 Vigilante is going to be handling the human factors 21 aspect of, you know, what the warnings should be 22 saying potentially, that people can understand 23 them. 24 He should be talking about the font and</p>
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<p>1 the language should be to comply with the standard? 2 A Just that this particular dryer doesn't 3 specifically indicate to the user -- and I say 4 "this dryer." I mean -- I mean all of the 5 literature associated with the dryer, both the 6 labels that are on the dryer, as well as the users' 7 guide, the installation instructions, the service 8 manuals, any service bulletins that we're aware of, 9 anyway. 10 None of them explicitly describe how to 11 appropriately service this dryer, to maintain this 12 dryer, other than a general description that the -- 13 that the interior of the dryer cabinet should be 14 cleaned approximately every 18 months by a 15 qualified servicer or an authorized servicer, 16 depending what the language is in that specific 17 version. 18 There's no specific instructions to 19 anyone on how to go about cleaning that, and while 20 2158 does require those -- those instructions per 21 the standard. 22 Q So in the ANSI standard, the Z21.5.1, 23 there's no prohibition to using plastics in a 24 residential clothes dryer, correct?</p>	<p>1 the color and the location and sizing and all that 2 kind of stuff, but I think obviously I'm qualified 3 experience-wise to discuss how users understand the 4 warnings that are included on their dryers or what 5 their tendency is to follow them, just based upon 6 the hundreds and -- well, several hundred 7 interviews I've probably done or been involved 8 with, as well as depositions of the homeowners, and 9 specifically in regards to the design. 10 That's probably the other aspect of where 11 my testimony is most relevant is following the 12 safety hierarchy, saying that if you recognize this 13 problem, you should design the product to eliminate 14 it. If you can't do that, you should safeguard it; 15 and lastly, if you can't do that, you should rely 16 on warnings and instructions. 17 And that's essentially what one of my 18 issues is with these products is Electrolux is 19 relying upon consumer instructions as the primary 20 method of preventing this specific type of lint 21 fire. 22 Q So going back to what you just said a 23 moment ago, that you believe that you're qualified 24 because of your experience with these</p>

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<p style="text-align: right;">122</p> <p>1 investigations and also interviewing homeowners, 2 right?</p> <p>3 A Well, to that aspect.</p> <p>4 Q Right.</p> <p>5 A I mean, obviously there's training, 6 education, and experience always counts as far as 7 qualifications go.</p> <p>8 Q Of course.</p> <p>9 A But as far as understanding what users do 10 and what they will do, obviously, you know, you can 11 be a human factors expert and read a book and 12 testify as to those features specifically, about 13 the understanding level and whatever else, but at 14 least I have a real world understanding of what 15 people actually do when they see these warnings. 16 How do they behave? What are they doing? 17 Because I ask the questions, did you see there was 18 a warning? Did you read the book? And people give 19 you their real answers.</p> <p>20 Q But in the investigations that you're 21 involved in, all those dryers were involved in 22 fires, right? So those -- so the homeowners that 23 you're talking to, they all had fires?</p> <p>24 A That's absolutely true for that part,</p>	<p style="text-align: right;">124</p> <p>1 question for you. What do you do? You're the 2 average person. I want to find out."</p> <p>3 So I'm doing as much as I can all the 4 time to try to keep abreast of how people maintain 5 or use or, you know, all these different things 6 that go into -- to make certain that, you know, 7 what we're seeing out there isn't just a one-off 8 issue, and, of course, it can't be one-off because 9 we have thousands of these dryer fires.</p> <p>10 Q So when you're having these 11 conversations, what do you -- what have you learned 12 from them?</p> <p>13 A Just that it's general principles of -- 14 you know, if there's no symptoms of improper 15 operation or whatever, people generally do the 16 minimum amount of maintenance that they think they 17 need to do.</p> <p>18 Most people I know -- and this goes 19 through the interviews as well, too, but people 20 I've actually had conversations about this with, 21 you know, they understand, whether it's because 22 they're taught at a very early age or whatever, 23 that they've got to clean the lint screen after 24 they use the dryer, and most people agree with</p>
<p style="text-align: right;">123</p> <p>1 yes, but we've also, you know, done surveys as far 2 as maintenance goes where we've asked people, you 3 know, what do they do.</p> <p>4 We've asked servicers, what's the program 5 for conducting maintenance? And so we have 6 information there, too.</p> <p>7 Q And I'm familiar with the surveys you've 8 done with regard to the authorized servicers. How 9 would you characterize that group of servicers?</p> <p>10 A I think that's a good -- authorized 11 servicers.</p> <p>12 Q Have you done any other types of surveys, 13 other than speaking with the homeowners that have 14 been involved in fires, but any other type of 15 surveys where you're talking to homeowners about 16 their behavior with regard to warnings?</p> <p>17 A Nothing overly official. I mean, I talk 18 to people about dryer fires all the time. I mean, 19 that's unfortunately my lot in life is to be 20 concerned about people's clothes dryers, so I have 21 conversations with family, friends, and even people 22 randomly that I meet about, what do you do?</p> <p>23 And then I'll start talking about things, 24 and we'll get into it, and I'll say, "Hey, I got a</p>	<p style="text-align: right;">125</p> <p>1 that, and that's consistent with the CPSC study 2 that says that most people clean the lint screen 3 between uses or at least on a fairly regular basis.</p> <p>4 And there's times I'll admit I don't 5 clean the lint trap between every single dryer 6 load. If I dry one pair of nylon running pants, 7 there's no lint. I might check it, but I might not 8 clean it.</p> <p>9 So there's a difference between 10 reasonable and unreasonable certainly as far as 11 that stuff goes, but that's -- that's one thing 12 that I've observed through all my experience, is 13 that, you know, people understand to do that, but 14 beyond that, people really don't get that there's 15 further recommendations to, say, clean the dryer 16 every 18 months, which is kind of a specific thing 17 to Electrolux.</p> <p>18 Q Mike, have you had the opportunity to 19 review Dr. Vigilante's report in this matter?</p> <p>20 A Yes, I think I have.</p> <p>21 Q Do you have an understanding that he 22 drafted proposed warnings for the dryer?</p> <p>23 A That's my understanding, yes.</p> <p>24 Q Okay. Have you done anything like that,</p>

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<p style="text-align: right;">126</p> <p>1 either in the Cloud case or in any other Electrolux 2 dryer cases? 3 A No. That's really the difference between 4 Dr. Vigilante and myself and Mr. Parsons is, you 5 know, we recognize through the safety hierarchy 6 that there is a need for a warning certainly, and 7 through our own analysis independently of the 8 warnings that are either listed on the dryer or in 9 the manuals, we understand that there is no 10 specific warning or instruction about removing lint 11 from the area of the heat source behind the drum 12 where we see large accumulations of lint occurring. 13 So we understand that there's a need for 14 more specific warnings, but that's not in our realm 15 of expertise to lay out the warnings and write the 16 warning and stuff. 17 Q Got it. 18 So a few minutes ago, you testified about 19 your criticism of the information or lack of 20 information given to authorized servicers with 21 regard to cleaning the dryer? 22 A Yes. 23 Q So are you -- are you prepared to offer, 24 either today or will you be at trial, the exact</p>	<p style="text-align: right;">128</p> <p>1 Q Okay. Was that at the same time you were 2 doing the burn testing? 3 A It was shortly after, within a week or 4 two, I think. 5 Q Okay. And was there a protocol for that 6 testing? 7 A There was, and it should be -- I think 8 there is. 9 Q Since we have the hard drive up, if you 10 don't mind pulling that up. 11 A I don't see a protocol here, so we might 12 not have actually written, like, a formal protocol. 13 I think we just documented the protocol with all 14 the photographs and stuff. 15 Q Okay. 16 A But it was primarily based on the UL 2158 17 fire containment test, or at least the base fire 18 containment test. 19 Q That was going to be my next question. 20 So is that the -- you were doing a base fire 21 containment test only? 22 A Yes, because Electrolux or GE, one of the 23 two or both of them, had already done a drum fire 24 containment test, and that's why they decided to</p>
<p style="text-align: right;">127</p> <p>1 instructions that you believe Electrolux should 2 provide to servicers with regard to how to clean 3 the dryer? 4 A No. My opinions would be that there are 5 no instructions. We've never been produced with 6 any instructions or videotapes or anything like 7 that, that specifically says how a servicer should 8 be disassembling the dryer and where they should 9 remove lint from and different things like that. 10 That's going to be my specific testimony. 11 As far as the step-by-step instructions, 12 that would be more in Dr. Vigilante's realm. 13 Q That's what I was asking about, and I 14 apologize if it was a bad question. I was curious 15 as to whether you had come up with in your mind 16 what those steps should be for the servicer. 17 A No, not specifically. 18 Q Okay. 19 A Other than there needs to be steps, but 20 I'm not going to say what they are. 21 Q All right. So it's my understanding from 22 reading your report, you conducted fire containment 23 testing in October 2013? 24 A That's correct.</p>	<p style="text-align: right;">129</p> <p>1 change the plastics in the GE models alone. We 2 didn't feel the need to do a drum fire containment 3 test. 4 Q Okay. And that drum fire containment 5 test that you were just referring to, I typically 6 refer to it as the GE SEE test. Is that how you 7 refer to it? 8 A Right, S-E-E. 9 (At this time, a discussion was 10 held off the record.) 11 BY MS. YEMMA: 12 Q Okay. So going back to the fire 13 containment, you just did a base fire containment 14 test following the UL 2158? 15 A For the most part, yeah. We didn't do 16 the induced airflow because we just didn't have the 17 exact type of setup that the UL labs do, but we 18 used the same type of cheesecloth they use to 19 simulate lint collection. We did the same 20 layering. Eight layers, I think it was. 21 Like I said, aside from the -- aside from 22 the ventilation airflow, everything else was the 23 same or substantially similar. We draped the -- 24 draped the dryer in one layer of cheesecloth</p>

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<p style="text-align: right;">130</p> <p>1 underneath and all around, and the passing or</p> <p>2 failing of the test all depends on whether the</p> <p>3 outside cheesecloth is damaged.</p> <p>4 Q Right.</p> <p>5 So did -- how many dryers did you use in</p> <p>6 the testing?</p> <p>7 A We just did one.</p> <p>8 Q And it was a ball-hitch?</p> <p>9 A Yes.</p> <p>10 Q And what year -- oh, it does say in your</p> <p>11 report. So 1998, that was the year of manufacture?</p> <p>12 A And I'll just check with the photos, too.</p> <p>13 I should have a photo of the label.</p> <p>14 Q That's on page 163, Mike.</p> <p>15 A Okay. Yeah, so -- right. So we took</p> <p>16 a -- we took a 1998 dryer. We cleaned all of the</p> <p>17 inside of the dryer. We replaced the blower</p> <p>18 assembly, the blower housing assembly, with an</p> <p>19 HB -- full HB-rated assembly, because this one had</p> <p>20 a metal assembly. The other one -- not all dryers</p> <p>21 do.</p> <p>22 So we did that, and then we tested the</p> <p>23 dryer. We had -- that's one of the exemplars we</p> <p>24 had on the end we can burn. That's why we chose</p>	<p style="text-align: right;">132</p> <p>1 Q I wasn't in my mind.</p> <p>2 So you changed out the blower housing,</p> <p>3 and you added the cheesecloth?</p> <p>4 A That's correct.</p> <p>5 Q Okay. So what happened -- well, what did</p> <p>6 the test show?</p> <p>7 A Well, so the purpose of the test is to</p> <p>8 simulate some accumulation of lint in the base of</p> <p>9 the cabinet. That's why we introduce the</p> <p>10 cheesecloth, the inside.</p> <p>11 The test is some -- or sorry. The</p> <p>12 standard is somewhat vague and just says, you know,</p> <p>13 you should put lint where you expect it, so we</p> <p>14 basically used the floor plan of it.</p> <p>15 We probably could have even put more in</p> <p>16 there, but we chose to kind of minimize the amount</p> <p>17 of cheesecloth we used, and we ignited it using the</p> <p>18 protocol's method of basically a match.</p> <p>19 We used a trailer of cheesecloth to get</p> <p>20 it to go towards the front because, again, we</p> <p>21 didn't line the whole base. We only put</p> <p>22 cheesecloth on I think the front half or something</p> <p>23 like that. Let me look at the photographs.</p> <p>24 Q If you could pull up some photos, that</p>
<p style="text-align: right;">131</p> <p>1 the 1998 dryer.</p> <p>2 Q Was it a used dryer? Do you know?</p> <p>3 A It was.</p> <p>4 Q Okay. And do you know the history of the</p> <p>5 dryer? Like, was it used in someone's home?</p> <p>6 A Yes, it would have been used in someone's</p> <p>7 home. We bought it from an appliance refurbisher,</p> <p>8 but, again, I mean, as far as the fire containment</p> <p>9 aspect goes, it was fully functioning. All the</p> <p>10 screws, fasteners, everything else was there, and</p> <p>11 we cleaned it like it was factory new.</p> <p>12 There was no additional lint on top of</p> <p>13 the cheesecloth. The cheesecloth was the only fuel</p> <p>14 that we -- that we added, which is required by the</p> <p>15 testing.</p> <p>16 Q Okay. So the only -- the only</p> <p>17 modification -- well, was the only modification you</p> <p>18 changing out the blower housing?</p> <p>19 A Yes, as far as the factory parts goes,</p> <p>20 yes, yeah.</p> <p>21 Q And you added the cheesecloth?</p> <p>22 A Right, whether you consider that a</p> <p>23 modification or not. I mean, that's however you</p> <p>24 find it.</p>	<p style="text-align: right;">133</p> <p>1 would be helpful to illustrate what you're saying.</p> <p>2 A Once this opens up, this is the -- this</p> <p>3 is the pattern that we use to cut the cheesecloth</p> <p>4 out, and then I think it shows the cheesecloth as</p> <p>5 well. Oh, there's the dimensions of the pattern.</p> <p>6 Q Okay. So this is showing --</p> <p>7 A Yeah, it's showing graph paper. It's</p> <p>8 showing the sketch, so all we did, instead of</p> <p>9 lining the whole entire base with cheesecloth, we</p> <p>10 just put lint up front because we know there's</p> <p>11 typically some lint escaping from the front drum</p> <p>12 seal.</p> <p>13 So essentially on the right side of this</p> <p>14 drawing, you can see there's kind of a rectangular</p> <p>15 cutout there. That's where the blower is, so we're</p> <p>16 basically around the right side of the blower</p> <p>17 assembly, in front of the blower assembly with two</p> <p>18 narrow areas, and then a larger area in the base.</p> <p>19 And because it's an electric dryer, we</p> <p>20 didn't have a gas burner, so we just -- you know,</p> <p>21 we used a ten-inch-wide piece of cheesecloth in the</p> <p>22 front, and then I'll show you the next photograph.</p> <p>23 Q So is that the dimensions of all the</p> <p>24 cheesecloth that was in the base?</p>

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<p style="text-align: right;">134</p> <p>1 A Not entirely, because we had a trailer, I 2 mean, a long skinny strip because the access panel 3 is in the back of the dryer, so we had to ignite 4 that from someplace. 5 Q Okay. 6 A So we just used a small trailer, which I 7 think was about an inch wide. 8 Q So the access panel, is that -- I'm 9 trying to understand how you're lighting the 10 cheesecloth inside. So is -- 11 A I don't actually -- I take that back. 12 Let me look at the photographs. I think we might 13 have used the gas -- the gas pipe opening as the 14 entry point. 15 Q Okay, right. Even though it's electric, 16 it would have -- 17 A Yeah, it still has a gas pipe cutout. 18 Q Right. 19 A Okay. You can see, too. Like I said, we 20 cleaned out all the lint and everything in the 21 different areas. 22 Q So looking -- Mike, if you could just 23 identify this document. 24 A Yeah, sure.</p>	<p style="text-align: right;">136</p> <p>1 Q That's in Photograph 43? 2 A Photo 43. 44 shows the camera. 3 Q So the cheesecloth, you're just laying it 4 on the base, for lack of a better word? Like, 5 you're not attaching it? 6 A Right. It's resting on the base. That's 7 the way -- it's kind of laid out in the standard, 8 and then the trailer is needed because we ignite 9 the trailer of cheesecloth from the back corner 10 through the opening for the gas pipe. 11 So the flame burns along that until it 12 hits the bigger -- the bigger area, and, again, the 13 standard isn't 100 percent clear as far as where it 14 should be placed, the cheesecloth and everything, 15 so we did our best approximation of the standard, 16 so because each design is different. 17 Q Does the standard set forth that it 18 should be a cheesecloth trail to light it? 19 A I think it does. It says something -- it 20 says something that a trailer may be used. It's -- 21 yeah, we try to stick to the standard as much as 22 possible. 23 Like I said, we may have actually even 24 went below it because you're actually supposed to</p>
<p style="text-align: right;">135</p> <p>1 Q So we can have it on the transcript. 2 A It's under the photo folders for the -- 3 let me actually go back a second. I'll identify it 4 in one second. 5 Q Okay. 6 A But these photographs document the 7 condition of the inside of the dryer. 8 Okay. So the top of the document says 9 Electrolux Fire Containment Testing_burn test_ 10 10-31-2013. It's in the folder of photos. 11 So Photo 25 in this document, this shows 12 the overall of the cheesecloth in front, so 13 around -- around the bottom front. Again, we 14 didn't do the whole base. Photo 26 shows the 15 layers of the cheesecloth that we used, again per 16 the standard. Photo 43 shows the trailer that goes 17 back to the gas burner hole. 18 Q Okay. 19 A And then we also put some videocameras 20 inside to show what's happening inside. 21 Q Where were the videocameras located? 22 A I think we just used the one videocamera 23 you see in the photo, but it's attached to the 24 inner left wall down below the drum.</p>	<p style="text-align: right;">137</p> <p>1 put cheesecloth over the lower wiring harness, and 2 we didn't do any of that. We figured, if anything, 3 the less the better. Let's not bias this in any 4 way. We'll just put a reasonable amount of 5 cheesecloth in the bottom. 6 Q So then what -- so after you lit the 7 cheesecloth trail, what happened after that? 8 A First we put the dryer back together, and 9 then we draped the whole dryer. There was a single 10 layer of cheesecloth underneath it, and then the 11 whole dryer was enclosed in a single layer of 12 cheesecloth, the front, back, two sides, and top, 13 and we put that underneath the burn hood. 14 And when the testing was started, we just 15 lifted up the cheesecloth in the back to ignite the 16 trailer inside through the opening, and we put the 17 cheesecloth down fully over the dryer to see what 18 would happen. 19 Q And the dryer is off when you're doing 20 this? 21 A I'm trying to remember. I'm trying to 22 remember if we were running the dryer. I think the 23 dryer was off, because there's two -- there's two 24 tests for the UL fire containment test. There's</p>

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<p style="text-align: right;">138</p> <p>1 actually two general tests.</p> <p>2 There's a drum fire containment and a</p> <p>3 base fire containment, but there's a static with</p> <p>4 the dryer off and a dynamic with the dryer on.</p> <p>5 Q So what -- if you could look in your</p> <p>6 report, does it --</p> <p>7 A That's on there. Yeah, it was static.</p> <p>8 We did the static base fire containment test.</p> <p>9 Q So that's the dryer on -- off?</p> <p>10 A Off.</p> <p>11 Q Off?</p> <p>12 A Correct. So no other heat in the dryer,</p> <p>13 no warm, and that's -- again, why we kind of did</p> <p>14 that is -- it was -- this was something that we did</p> <p>15 on our own time and funding, so instead of doing</p> <p>16 multiple dryers and costing even more, we figured</p> <p>17 we would use the static test because nothing is</p> <p>18 preheated. There's no extra heat from the running</p> <p>19 dryer that's affecting anything, no airflow fanning</p> <p>20 the flames or anything like that. It's just</p> <p>21 standard off condition.</p> <p>22 Q Did you have any venting connected to the</p> <p>23 dryer?</p> <p>24 A No. Now, we had it discharging directly</p>	<p style="text-align: right;">140</p> <p>1 Q Sure.</p> <p>2 A Yeah. So these photographs include kind</p> <p>3 of the --</p> <p>4 MS. YEMMA: Off the record.</p> <p>5 (At this time, a discussion was</p> <p>6 held off the record.)</p> <p>7 THE WITNESS: So this is -- so</p> <p>8 back on?</p> <p>9 MS. YEMMA: Sure.</p> <p>10 THE WITNESS: Like, 97, that</p> <p>11 shows the cheesecloth being draped fully.</p> <p>12 You can see the cheesecloth in 97 and 98.</p> <p>13 98 is the lower front corner of the dryer</p> <p>14 from the front, and the cheesecloth is</p> <p>15 again below the dryer and hanging down</p> <p>16 the front.</p> <p>17 BY MS. YEMMA:</p> <p>18 Q And it looks like you have the dryer on a</p> <p>19 cinderblock, right?</p> <p>20 A It's up on cinderblocks so we don't</p> <p>21 damage our floor. Then it's on the top piece of</p> <p>22 concrete board just like the other testing, just</p> <p>23 protecting our facility.</p> <p>24 And then Photo 103 is the first -- the</p>
<p style="text-align: right;">139</p> <p>1 into our burn hood area.</p> <p>2 Q Okay. So there was nothing -- the</p> <p>3 exhaust opening was just open. There wasn't -- you</p> <p>4 didn't put a cap or anything on it?</p> <p>5 A Correct.</p> <p>6 Q So then -- so then after you've put the</p> <p>7 cheesecloth in the way you just described on the</p> <p>8 outside of the dryer and underneath it, then what</p> <p>9 happened? What did you do next in the test?</p> <p>10 A Again, we just lifted part of the</p> <p>11 cheesecloth. We ignited the trailer inside and</p> <p>12 videotaped it and made our observations.</p> <p>13 Q And what were those observations from the</p> <p>14 testing?</p> <p>15 A That the cheesecloth was burned after the</p> <p>16 test. There was flames coming out of the cabinet</p> <p>17 where the plastics were the fuel. None of the</p> <p>18 plastics self-extinguished. It was dripping</p> <p>19 plastic coming out of the lower seam dropping onto</p> <p>20 the surface that we had below it, and, again, I got</p> <p>21 the video.</p> <p>22 Q That's okay.</p> <p>23 A There might even be photographs of the</p> <p>24 test process. Let me see.</p>	<p style="text-align: right;">141</p> <p>1 first ignition of the cheesecloth on the front of</p> <p>2 the dryer at the very bottom right-hand corner, so</p> <p>3 that automatically would fail the UL fire</p> <p>4 containment test.</p> <p>5 The cheesecloth, especially in the</p> <p>6 vertical orientation being draped over the</p> <p>7 appliance, once that caught fire, that burned</p> <p>8 pretty easily, but we just -- we let the dryer burn</p> <p>9 a little further. Again, we were doing this in our</p> <p>10 building, so we didn't want a full, full fire, but</p> <p>11 we let it burn for a while.</p> <p>12 Photo 108, you can see the cheesecloth is</p> <p>13 burned off the front and sides of the dryer, and</p> <p>14 there's a -- there's a puddle of melted burning</p> <p>15 plastic right under the right front corner. I</p> <p>16 think I probably have close-ups of that.</p> <p>17 Q Okay.</p> <p>18 A So that would be the same thing in Photo</p> <p>19 109 and Photo 110. 110 you can actually see the</p> <p>20 puddle of flaming plastic, and at that point in</p> <p>21 time, all the cheesecloth fuels are burned out from</p> <p>22 that area, so that is only from the plastic.</p> <p>23 Q Okay. How long did you let it burn?</p> <p>24 A I'd have to look at the video to see.</p>

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<p style="text-align: right;">142</p> <p>1 Q And then how did you -- how did you 2 extinguish it? 3 A With water. I'm kind of a firefighter. 4 Q Just curious. 5 A I was a firefighter for 20 years. 6 Q Right. 7 A So I'm pretty well-versed in putting out 8 fires. 9 Q You did it inside? 10 A Yeah. I mean, we're smart. We're fire 11 people. We know what we're doing. We typically 12 let the video run for a minute or two before we do 13 stuff. 14 Okay. So that is Ron lighting the fire 15 at about a minute -- he probably would have put the 16 flame to it at the two-minute mark or just about. 17 This -- this video here is a four-camera view, so 18 the lower two photographs, there's actually two 19 cameras inside. 20 One is directly behind the motor looking 21 at the back of the blower assembly, in addition to 22 that other one we discussed, so I apologize about 23 missing that earlier. 24 And the flame traveled across the</p>	<p style="text-align: right;">144</p> <p>1 It's not an excellent fuel. It's easy to ignite, 2 but it doesn't -- it doesn't last very long because 3 it's so lightweight. 4 It's six minutes in, roughly. There's, 5 you know, just flame at the bottom of the trap duct 6 is about all that's burning. Again, all the 7 cheesecloth has been consumed, so all that flame is 8 just from the plastic. It starts to grow a little 9 bit in the next minute or two. 10 I'm just going to skip ahead a little 11 bit. 12 Q Yeah. 13 A Seven and a half minutes in, we got a 14 pretty vigorous fire from the plastic burning in 15 the front of the appliance. 16 So we're at nine minutes and 45 seconds, 17 and that's when the cheesecloth first ignites, and 18 that's 9:45 into the video, so it's been about 19 seven minutes and 45 seconds since we first lit the 20 fire. 21 Q Okay. 22 A And then the cheesecloth burns up, and 23 then there's molted plastic dripping out. 24 I'll skip ahead a little bit. About 12</p>
<p style="text-align: right;">143</p> <p>1 trailer, ignited the cheesecloth, and then in turn 2 lights the plastic. So at about three minutes and 3 15 seconds in, the fire has made it across the 4 cheesecloth trailer and has just ignited the main 5 cheesecloth addition. 6 About three minutes and 40 seconds in, 7 it's impinging on the blower housing where the 8 blower housing meets the exhaust duct. It takes a 9 few minutes, but I'll skip ahead just a little bit. 10 We're at four minutes and 30 seconds, 11 roughly. You can actually see in the lower 12 right-hand photograph, the foam seal between the 13 blower housing and the plastic trap duct has 14 ignited, and that's what's kind of burning 15 vigorously in that area, and it looks like the 16 bottom side of the plastic trap duct is also 17 burning. 18 Five minutes into the video, and we don't 19 have any visible flame outside. Again, we ignited 20 about two minutes into the video, so it's taken 21 about three minutes to get where we're at right 22 now. Almost all the cheesecloth has been burned 23 away at this point in time. 24 Cheesecloth is very similar to lint.</p>	<p style="text-align: right;">145</p> <p>1 and a half minutes in, the paint is discolored. 2 There's a pool of burning plastic under the 3 appliance at the right front corner, smoke coming 4 out of the seams, licks of flame coming out the 5 right side, and that's pretty typical of what we 6 see in all the test burns we've done on these 7 different dryers. So we extinguished at about 16 8 minutes. 9 Q Okay. The other two videos, Mike, we 10 don't have to watch them, but you can just -- 11 A Those are just -- 12 Q Different cameras? 13 A In this particular test, we had four 14 cameras. There were two inside and two outside, 15 and just because of the way our video capture is, 16 the two inside, we didn't have them as individual 17 files, but the other two outside ones are the 18 actual individual files. 19 Q The one we were watching had all four 20 angles? 21 A Correct. 22 Q Got it. 23 So -- and I think I asked you this 24 before, but just to confirm, so you did the fire</p>

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<p style="text-align: right;">146</p> <p>1 containment testing just on the Electrolux electric 2 dryer, freestanding; is that right? 3 A That's correct. 4 Q Okay. 5 A Because, again, I mean, the fuels are all 6 the same in the gas models and the electric models. 7 Q I understand. 8 A Well, I say that. So they are and they 9 aren't, so this is actually the better case 10 scenario, because in the gas dryers, we know in 11 certain circumstances and certain fires, anyway, 12 that once the plastic is burning, it can also 13 compromise the gas valve and let all kinds of gas 14 out and cause additional damage in some cases, so 15 obviously, you know, that would be the exception. 16 Q Is that what happened in the Cloud fire? 17 A There was -- we tested the gas valve in 18 the Cloud matter, and there was a little bit of 19 leakage, but based upon the condition of the gas 20 valve and the fire damage to that area, we -- it's 21 my opinion specifically, but it was also Mr. Rains' 22 opinion, that that was just heat damage to the 23 valve itself from the fire, so there was a little 24 bit of a leak, like, out of the orifice, but not a</p>	<p style="text-align: right;">148</p> <p>1 A Oh, we would have had our IT person do 2 the videotaping, and probably one of our other lab 3 technicians standing by, just a backup safety 4 person, another hose. 5 Q So you mentioned when we were talking 6 about the test setup that there was no induced 7 airflow as is called by the UL -- called for by the 8 UL 2158 test, right? 9 A That's right. They set up a blower 10 assembly to induce a certain amount of airflow 11 through the dryer, just really natural ventilation. 12 Q So where do they -- where is it set up? 13 A It's just essentially a fan that sucks 14 the exhaust -- sucks through the exhaust of the 15 dryer. 16 Q So on the outside of the dryer? 17 A That's my understanding, yeah. 18 Q Okay. And do you think if you had used 19 that in this test, it would have made any 20 difference in the outcome? 21 A No. I mean, the fan itself would have 22 only been the airflow through the normal course of 23 airflow in the dryer, meaning essentially it would 24 be like hooking up an exhaust to it with a fan</p>
<p style="text-align: right;">147</p> <p>1 significant leak of gas. 2 Q When you inspected the dryer with Mr. 3 Rains, did he share any of his conclusions about 4 the fire or anything, that you remember? 5 A I don't specifically recall. Obviously 6 we talked about the case and, you know, the details 7 that we had. I believe I shared with him some of 8 my interview information because we had done the 9 interview by telephone at that point in time. 10 Other than that, I don't recall any specific 11 details. 12 Q Okay. And have you had the occasion to 13 speak with Mr. Rains since that inspection? 14 A Yes. 15 Q Okay. Have you had other -- about the 16 Cloud case specifically? 17 A No. 18 Q Okay. Other -- other cases? 19 A Yeah. Mr. Rains is an expert in our 20 area. He doesn't live too far from our office, so 21 he's there on occasion. 22 Q Okay. Mike, did anyone apart from Mr. 23 Parsons participate in the fire containment testing 24 that you did?</p>	<p style="text-align: right;">149</p> <p>1 sucking the air the opposite way of the dryer, so 2 it would be pulling it through the cabinet, through 3 the back of the drum, down through the lint trap 4 and all that stuff. 5 Because it's a base fire containment 6 test, the plastic is attacked from underneath. It 7 wouldn't have made much of a difference. If 8 anything, it would have maybe increased the rate of 9 the fire slightly, made it burn a little more 10 vigorously, because extra ventilation generally 11 causes a bigger fire, at least a more intense fire, 12 so, again, that's one of the reasons why we just 13 chose not to do it. 14 Q Was the dryer set up -- you mentioned 15 earlier about a smoke hood? 16 A Yes. 17 Q Was this set up under that, under the 18 smoke hood? 19 A Yes. 20 Q So what does the smoke hood -- what's the 21 purpose of that? 22 A Just to vent the smoke out of our 23 building. 24 Q And was that something you turn on and</p>

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<p style="text-align: right;">150</p> <p>1 off?</p> <p>2 A Yeah, there's a fan on it. It's much</p> <p>3 like a fan in a restaurant hood.</p> <p>4 Q Okay.</p> <p>5 A So it's like a gigantic restaurant hood</p> <p>6 is basically what it is.</p> <p>7 Q And was that on during the testing?</p> <p>8 A It was, and our fan is variable, so we</p> <p>9 always try to keep it as low as possible, so it</p> <p>10 doesn't affect anything, just for the record.</p> <p>11 Q Okay. And did you turn the fan on</p> <p>12 when -- before the cheesecloth was lit?</p> <p>13 A You know, I don't specifically recall.</p> <p>14 That's a good question. I believe we had it on low</p> <p>15 when we would have ignited the cheesecloth, but it</p> <p>16 would have been on its lowest setting. We only</p> <p>17 typically turn it up when the smoke starts to</p> <p>18 overpower whatever fan setting we have on it,</p> <p>19 because it's just a better way to do it.</p> <p>20 Q Understood.</p> <p>21 So during the video that we watched, was</p> <p>22 there a point at which the fan speed was increased</p> <p>23 from the low setting?</p> <p>24 A There might have been. It's possible,</p>	<p style="text-align: right;">152</p> <p>1 A I mean, it's on our hard drive, too, so</p> <p>2 it's been produced to you guys and to a lot of our</p> <p>3 other clients as well.</p> <p>4 Q Mike, have you done any investigations</p> <p>5 involving dryer fires that -- dryers that were</p> <p>6 manufactured by entities other than Electrolux?</p> <p>7 A Oh, yeah. I do all kinds of dryer fires.</p> <p>8 Q Have you testified in any of those cases?</p> <p>9 A No, I have not.</p> <p>10 MR. HUGHES: He's testified in</p> <p>11 trial testimony or deposition testimony?</p> <p>12 MS. YEMMA: Testified at all.</p> <p>13 THE WITNESS: Yeah, my answer</p> <p>14 for both is not --</p> <p>15 BY MS. YEMMA:</p> <p>16 Q It's still none?</p> <p>17 A Yeah.</p> <p>18 Q Okay. And in any of those investigations</p> <p>19 that you conducted, are any of those dryers</p> <p>20 bulkhead design dryers?</p> <p>21 A Yes.</p> <p>22 Q And have you concluded in any of those</p> <p>23 cases, if you can remember, whether lint was the</p> <p>24 first material ignited?</p>
<p style="text-align: right;">151</p> <p>1 although there wasn't a ton of smoke coming from</p> <p>2 this thing, but there was enough that it probably</p> <p>3 would have been boosted up to at least medium at</p> <p>4 some point in time.</p> <p>5 Q Are there three settings for the fan?</p> <p>6 A No, it's a variable control.</p> <p>7 Q So it would have gone from low to medium?</p> <p>8 A Well, we adjust as necessary, so</p> <p>9 sometimes it can be, you know, multiple steps, not</p> <p>10 low, medium, high. Again, it's infinitely</p> <p>11 variable, so --</p> <p>12 Q Okay. Mike, going back to the component,</p> <p>13 the burn testing that we talked about a little</p> <p>14 while ago. Did you share the results of that</p> <p>15 testing with anyone outside of the Wright Group?</p> <p>16 A Yes.</p> <p>17 Q Okay. Did you share it with specifically</p> <p>18 any -- like, Mr. Fallows, for example? Did you</p> <p>19 share it with him?</p> <p>20 A Yes, yeah. He was involved, like I said,</p> <p>21 in the fire containment testing because he was</p> <p>22 testifying about the plastics' behaviors in a</p> <p>23 different case at the time we did the test.</p> <p>24 Q Okay.</p>	<p style="text-align: right;">153</p> <p>1 A Yes, just in a different manner. I mean,</p> <p>2 the design itself makes it different. The specific</p> <p>3 opinion that we have about where lint becomes the</p> <p>4 first fuel ignited in the Electrolux ball-hitch</p> <p>5 dryers are going to be different from the bulkhead</p> <p>6 dryers because it's entirely different design.</p> <p>7 There's no heater pan using the same arrangement or</p> <p>8 no back of the drum.</p> <p>9 Q So in the cases involving the bulkhead</p> <p>10 dryers that were involved in fires, do you -- what</p> <p>11 was your opinion as to where the lint was ignited,</p> <p>12 where the lint was first ignited?</p> <p>13 A It depends on the actual dryer itself.</p> <p>14 There is one bulkhead dryer that actually has the</p> <p>15 heating element attached on the bulkhead up high.</p> <p>16 I'm not a fan of that design, either, quite</p> <p>17 frankly, because, again, it allows lint to</p> <p>18 accumulate there.</p> <p>19 Q Who manufactures that dryer?</p> <p>20 A It's not made anymore. It was made back</p> <p>21 in the '80's or '90's, but I think it was Amana</p> <p>22 that made that one --</p> <p>23 Q Okay.</p> <p>24 A -- before they got bought out by Maytag</p>

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<p style="text-align: right;">154</p> <p>1 or something, but that one was a lint fire that 2 ignited from the heating element directly behind 3 the drum, or up and to the left of the drum, should 4 I say. That's probably more accurate. 5 And then we've had other bulkhead dryers 6 where the heating element's been on the floor that 7 has had lint fires where lint has built up in the 8 base and crept inside of the heater chamber and 9 been ignited that way. 10 Q That's in an electric? 11 A In an electric, yes, actually gas, too, 12 both of them. 13 Q Okay. 14 A And then we've also had fires in bulkhead 15 dryers, the traditional Whirlpool which has the 16 lint screen on top. Those electric dryers, or the 17 majority of them, anyway, have their heating 18 element behind the bulkhead, kind of 19 compartmentalized. 20 In that case, we've had dryers where 21 lint's ignited with the heater box there, but 22 that's typically a result of a breach or a tear or 23 something on the venting behind where the lint's 24 being shot up in that area.</p>	<p style="text-align: right;">156</p> <p>1 that out, so that case went away as well. 2 Q Okay. So of the three or four, you did 3 destructive exams on those dryers; is that right? 4 A Yes. 5 Q So the other two to three or -- no. 6 A Yeah, two to three. 7 Q Two to three, let's say. 8 The other two to three, you didn't 9 disassemble those dryers? 10 A They haven't been to that point in the 11 case yet. Either they were closed already because 12 they determined it wasn't worthwhile to do a joint 13 exam, or we just haven't got around to it, or 14 whatever the reason behind it, we just never looked 15 at those. 16 Q But did you play any role in 17 investigating those fires? 18 A Sure. We've gotten them in our lab where 19 we do our typical process where, "Hey, we got a 20 dryer fire. 21 "Okay. Send it to us." 22 It doesn't matter to us who makes what or 23 what design it is. We get the dryer fire in. We 24 do a preliminary examination. We report our</p>
<p style="text-align: right;">155</p> <p>1 Q Okay. Have you had any -- have you been 2 involved in any investigations with an Electrolux 3 bulkhead dryer that resulted in a fire? 4 A Yes. 5 Q Okay. How many? 6 A I think five or six to date, and they've 7 been being built since about 2008, so that's pretty 8 reduced odds there. 9 Q Have any of those fires resulted in 10 litigation, as far as you know? 11 A No. I can tell you that of the five, I 12 think I've only done joint exams on three or 13 maybe -- sorry. Of the five or six, I've only done 14 exams on three or four of them. 15 One of them I know was a drum load fire 16 from a -- I forget what the exact cause of it was, 17 but it was definitely a load-related fire, a 18 spontaneous combustion of something. 19 One was a victim of a fire, so the fire 20 started outside the dryer; and the other two were 21 undetermined as far as the cause of the fire goes, 22 and one of them we I think may have had something 23 to do with the electronic control board in the 24 front, but that was missing, so we could never rule</p>	<p style="text-align: right;">157</p> <p>1 findings to our client, either verbally or in a 2 report, and we give them our report and preliminary 3 findings and let them decide if they're going to 4 do, you know, the next step, put the manufacturer 5 on notice for a joint exam. 6 Q Okay. Mike, if you could turn to page 7 173 of your report. 8 A Sure. 9 Q Okay. So focusing on the first paragraph 10 on that page, it starts out, "Based on the large 11 volume of depositions and discovery." 12 A Um-hmm. 13 Q And then at the end of that paragraph, 14 you state, "It is clear that Electrolux not 15 only" -- sorry. "It is clear that Electrolux was 16 not only negligent in failing to attempt any such 17 engineering improvements, but that they failed to 18 take any action at all." 19 And what is the -- what is the basis for 20 your opinion with regard to Electrolux? 21 A Just general engineering practices or 22 general safety practice, not even necessarily 23 engineering, but product safety practices. 24 So I do have training and experience in</p>

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<p style="text-align: right;">158</p> <p>1 understanding product safety, and based upon the 2 deposition testimony of Mr. King and Mr. Ripley and 3 Ricklefs and all the other design people and 4 different employees at Electrolux, it appears that 5 they don't have a valid product safety program in 6 place to evaluate and reduce risks. 7 Q So you just said the term "valid product 8 safety program;" is that -- 9 A Um-hmm. 10 Q So in your mind, what would be a valid 11 product safety program? 12 A Well, I mean, obviously different 13 corporations can do it differently. Certainly 14 there's multiple formats that they could choose to 15 do, but I think the most telling thing is 16 Electrolux's product safety engineer for the fabric 17 care division is -- has had no training in product 18 safety engineering whatsoever. 19 He's never been to an outside class. 20 Even in his own description of his experience in 21 the years at Electrolux, he hasn't had any training 22 whatsoever. 23 So a product safety engineer is supposed 24 to pay attention to product safety and reduce the</p>	<p style="text-align: right;">160</p> <p>1 as a model certainly, but it's not just for their 2 own employees, although most of their employees 3 were there. There was even I think three product 4 safety engineers from GE were in the same class as 5 myself and one of our other people. 6 But it goes through the whole process of, 7 you know, the reason for product safety, the 8 standards that they have, what you have to comply 9 by as far as the legal standards and requirements, 10 local jurisdictions, international law, all that 11 kind of stuff. 12 It talks about the risk assessment 13 evaluation, failure modes and effects analysis. It 14 talks about checks and balances, why it's important 15 to have product safety engineers work with design 16 engineers. It talks about their responsibility, 17 the corporate responsibility, both ethically and 18 financially, to do that stuff. 19 And then, you know, obviously they walked 20 us through some of their specific techniques as far 21 as their -- their -- I'm trying to remember what 22 they call them specifically; essentially their 23 ratings system where they are looking at evaluating 24 the risk, what's the severity of the risk, what's</p>
<p style="text-align: right;">159</p> <p>1 risk to consumers. They're failing to do so. 2 Q Have you investigated any other dryer 3 manufacturers and whether they have product safety 4 programs? 5 A Yes. 6 Q Okay. And who have you researched? 7 A I haven't just researched. I've been -- 8 Q I'm sorry. 9 A I've been involved with them. Whirlpool 10 is the best example. Whirlpool's product safety 11 training program is a worldwide training program. 12 They invite other manufacturers to go to their 13 program. They do training for people from UL and 14 ANSI. They do training for people from CPSC. They 15 invited me to their training, so I think -- 16 Q Is that something you did? 17 A Yeah. I spent three days in Michigan at 18 their world headquarters in Michigan doing -- doing 19 their product safety training program, and they 20 didn't charge me a thing. The only thing I had to 21 do was pay for my own airfare and hotel. 22 It was an intensive program for three 23 days where they discussed not just their own 24 program. Obviously they like to tout their program</p>	<p style="text-align: right;">161</p> <p>1 the frequency of the risk. 2 We did a couple projects where we looked 3 at things like the coffee maker, the Mr. Coffee 4 coffee makers as a case study essentially. Then we 5 also did some group multi-tasking brain work stuff 6 to work through some problems, so it was a very 7 intensive program, and, you know, I know for a fact 8 they knew it. 9 Talking with the GE engineers that were 10 there, they have a similar model, enough that 11 they're sending their people for training, you 12 know, through their program as well. 13 Q What -- when did you attend this 14 Whirlpool -- the program? 15 A The actual three-day course was May of 16 2012, and I also did an online course, a 17 prerequisite, precursor course, April 2012. 18 Q Did they provide you with any materials 19 at the course? 20 A Yes. 21 Q Do you still have those materials? 22 A Oh, yeah. Actually they're on the hard 23 drive. 24 Q They're on the hard drive?</p>

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<p style="text-align: right;">162</p> <p>1 A They should be.</p> <p>2 Q Have you attended any other seminars or</p> <p>3 programs like the Whirlpool one?</p> <p>4 A Not specifically from that corporate-type</p> <p>5 environment, but, yes, I've been involved in other</p> <p>6 training regarding product safety.</p> <p>7 We actually had a class in our office</p> <p>8 done by a somewhat local expert in the field. He</p> <p>9 did a small group class. I think there was,</p> <p>10 whoever was in the office, three or four of us that</p> <p>11 day that took part in a training program there.</p> <p>12 Q So what was discussed at that? Like,</p> <p>13 more product safety, or are we talking about</p> <p>14 corporate responsibility?</p> <p>15 A That was more generalized product safety,</p> <p>16 so specifically the safety hierarchy was the main</p> <p>17 focus of that class, and that was about maybe I'd</p> <p>18 say a half day, five or six hours.</p> <p>19 Q And who was it that put that on?</p> <p>20 A Dr. John Mrozik.</p> <p>21 Q Okay.</p> <p>22 A You've probably seen his name.</p> <p>23 Q I've seen his name.</p> <p>24 A Because we trained with him, we also cite</p>	<p style="text-align: right;">164</p> <p>1 engineering department, which is specific since</p> <p>2 probably, like, the mid-'80's, at least.</p> <p>3 Q Do you know how many people they -- so</p> <p>4 back when they started that department, how many</p> <p>5 product safety engineers they had?</p> <p>6 A That, I don't know.</p> <p>7 Q Have you ever spoken with product safety</p> <p>8 engineers at other dryer manufacturers other than</p> <p>9 Electrolux?</p> <p>10 A Whirlpool.</p> <p>11 Q Okay.</p> <p>12 A Yeah, Whirlpool and GE actually.</p> <p>13 Q And were they -- the folks from GE, were</p> <p>14 they ones that -- had they attended the program</p> <p>15 with you?</p> <p>16 A The GE people I spoke to, yes, they were</p> <p>17 at that program. The Whirlpool people I've spoke</p> <p>18 to, a few different product safety engineers have</p> <p>19 been at our lab for other cases.</p> <p>20 They send their own product safety</p> <p>21 engineers to all the inspections. They don't</p> <p>22 typically send outside experts to lab exams because</p> <p>23 they want to know what's happening with their</p> <p>24 product.</p>
<p style="text-align: right;">163</p> <p>1 one of his papers or articles.</p> <p>2 Q I remember seeing the name.</p> <p>3 A And then I've had a couple other seminars</p> <p>4 throughout the years that have -- that have been</p> <p>5 related to that kind of stuff, too, both at NASP,</p> <p>6 N-A-S-P, and IAAI talks about general, you know,</p> <p>7 product safety and things like that sometimes, too.</p> <p>8 Q Have you had any training or education</p> <p>9 with regard to corporate responsibility for product</p> <p>10 manufacturers?</p> <p>11 A No, not beyond the Whirlpool experience.</p> <p>12 Their product safety training was the only</p> <p>13 corporate-driven one.</p> <p>14 Q And do you know how long Whirlpool has</p> <p>15 been putting on that program? Like, for how many</p> <p>16 years?</p> <p>17 A It's been -- it's been years. They've --</p> <p>18 they're very proud of their program, so they</p> <p>19 explain it in detail. I want to say it's been at</p> <p>20 least 15 years, if not 20.</p> <p>21 I know they've had product safety people</p> <p>22 for longer in conversations I've had with their</p> <p>23 engineers at our facility and through that training</p> <p>24 program. They have had a product safety</p>	<p style="text-align: right;">165</p> <p>1 Q Okay. Do you anticipate -- and I realize</p> <p>2 it depends on what questions you're asked at trial.</p> <p>3 I'm trying to avoid the objection.</p> <p>4 Do you anticipate testifying at trial and</p> <p>5 giving any opinions as to what formal internal</p> <p>6 product safety standards or training Electrolux</p> <p>7 should have employed?</p> <p>8 A Well, again, I'm not a policymaker at</p> <p>9 Electrolux, so I don't have the power to dictate</p> <p>10 what they should or should not have done as far as</p> <p>11 corporate policy.</p> <p>12 All I can say is this is what they</p> <p>13 weren't doing, and this is -- you know, it's all</p> <p>14 factual information from the depositions and from</p> <p>15 the other records and stuff as to what they're</p> <p>16 doing, and certainly I can testify to my experience</p> <p>17 and what I'm aware of other manufacturers doing.</p> <p>18 Q So -- and I think just going back to the</p> <p>19 question, I'm curious as to whether you'll offer an</p> <p>20 opinion as to what you think Electrolux should have</p> <p>21 been doing.</p> <p>22 A Well, again, I think my product safety</p> <p>23 opinions are pretty well spelled out in my report.</p> <p>24 You know, it's -- you don't have to be an engineer</p>

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<p style="text-align: right;">166</p> <p>1 to understand the safety engineering hierarchy.</p> <p>2 It's very basic, and, of course, there's</p> <p>3 different iterations of that document. You can</p> <p>4 simplify it down to three steps or you can do it as</p> <p>5 many as, whatever, nine or ten steps, but certainly</p> <p>6 we know that they weren't doing it.</p> <p>7 You know, they looked at other potential</p> <p>8 issues that we know that they've redesigned the</p> <p>9 dryer, at least proposed to redesign the dryer</p> <p>10 numerous times in early 2000, 2001, 2002, where</p> <p>11 they thought about going to the bulkhead and their</p> <p>12 own engineers admitted that, you know, for whatever</p> <p>13 reason, whether it was cost or whatever, they</p> <p>14 decided to scrap or postpone that project.</p> <p>15 So, I mean, there's enough information</p> <p>16 out there that says that, you know, they at least</p> <p>17 thought about it, but they chose not to do it, and</p> <p>18 then, you know, there's other implementations like</p> <p>19 their airflow monitoring safety that they have in</p> <p>20 their electronic dryers.</p> <p>21 You know, they were doing it, but they</p> <p>22 were only doing it on models as an option, only the</p> <p>23 good and better models, not the base models like</p> <p>24 this one here.</p>	<p style="text-align: right;">168</p> <p>1 electronic control board and wiring and stuff to do</p> <p>2 exactly what they were doing. The technology was</p> <p>3 certainly there.</p> <p>4 Q Were other manufacturers in that</p> <p>5 timeframe, 2003, incorporating airflow monitoring</p> <p>6 in their dryers?</p> <p>7 A I have records of an airflow warning in</p> <p>8 Whirlpool dryers going back to 1994.</p> <p>9 Q That's the one that makes the audible --</p> <p>10 it's a sound?</p> <p>11 A Yeah, it makes a noise, a whistling noise</p> <p>12 or something like that.</p> <p>13 Q Whistling.</p> <p>14 Okay. Have you ever -- have you ever</p> <p>15 examined a Whirlpool dryer with that -- I don't</p> <p>16 know -- the device, the airflow monitor?</p> <p>17 A Can you clarify your question a little</p> <p>18 bit?</p> <p>19 Q I'm sorry. So we were just talking about</p> <p>20 the Whirlpool dryer you said from 1994 --</p> <p>21 A Yes.</p> <p>22 Q -- right?</p> <p>23 Okay. And it has the ability to monitor</p> <p>24 airflow?</p>
<p style="text-align: right;">167</p> <p>1 So, you know, something that was</p> <p>2 available to them with the technology they had,</p> <p>3 even when this dryer was manufactured in 2003,</p> <p>4 could have made a difference in reducing the risk</p> <p>5 of this specific fire.</p> <p>6 Q Was Electrolux -- as far as you</p> <p>7 understand, was Electrolux manufacturing dryers in</p> <p>8 2003 with -- that could monitor airflow?</p> <p>9 A Not specifically from my understanding.</p> <p>10 It's possible they may have started in 2003. I</p> <p>11 don't know when the exact design for that system</p> <p>12 was made by them. I have not had any information</p> <p>13 to nail that down as far as what date.</p> <p>14 But I know from the end of January -- the</p> <p>15 end of 2004 or at least by January of 2005 is when</p> <p>16 they started making those because that's when the</p> <p>17 service manual for those particular models were</p> <p>18 released was January 2005.</p> <p>19 Q The Clouds' dryer, though, was a</p> <p>20 mechanically controlled dryer. You agree with</p> <p>21 that?</p> <p>22 A It was. And, again, they could have --</p> <p>23 they could have easily incorporated portions of the</p> <p>24 electronic controls without needing all the</p>	<p style="text-align: right;">169</p> <p>1 A According to the instructions, yes.</p> <p>2 Q Okay. So -- and my question was, have</p> <p>3 you examined a dryer like that?</p> <p>4 A Like the one that was involved with the</p> <p>5 fire or just in general?</p> <p>6 Q Or just in general.</p> <p>7 A No.</p> <p>8 Q So your understanding of how that airflow</p> <p>9 monitor works, that comes from reviewing the</p> <p>10 instructions?</p> <p>11 A That's correct.</p> <p>12 Q Okay.</p> <p>13 A Yeah. It's similar to, like, the error</p> <p>14 code in the Electrolux manual. I haven't been able</p> <p>15 to get the Electrolux dryer to work right to do an</p> <p>16 error code, but the manual says it's supposed to</p> <p>17 work, so --</p> <p>18 Q So explain that to me. What do you mean?</p> <p>19 A So the electronic models that we're</p> <p>20 talking about, the good and better models, are</p> <p>21 supposed to give one of two things. Either one</p> <p>22 is -- if it has an alpha numeric display, it's</p> <p>23 supposed to give an E8C error code if the high</p> <p>24 limit trips too many times in a given period.</p>

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<p style="text-align: right;">170</p> <p>1 The good model, which doesn't have the</p> <p>2 alpha numeric display, emits four beeps and flashes</p> <p>3 the lights, and all it's doing -- it's very simple.</p> <p>4 It's actually the core of the design is kind of</p> <p>5 along the right idea.</p> <p>6 It's the same thing as we use for our</p> <p>7 example in airflow monitoring is reduced airflow</p> <p>8 results in over temperature conditions which causes</p> <p>9 the high limit safety to activate.</p> <p>10 So if the high limit safety is</p> <p>11 activating, you know, at least the sensor knows</p> <p>12 that the dryer is not getting the right airflow</p> <p>13 whether the customer realizes it or not, so it's</p> <p>14 there as an indicator, even though they may not be</p> <p>15 experiencing extending drying times, that their</p> <p>16 product isn't working properly.</p> <p>17 So I don't know what the period is, and I</p> <p>18 don't know how many times are too many times. I've</p> <p>19 never heard that explained in any deposition or</p> <p>20 anything like that, but clearly the technical data</p> <p>21 sheet and the service manuals, they say that this</p> <p>22 is supposed to occur. It's supposed to give a</p> <p>23 warning.</p> <p>24 Out of all the interviews and depositions</p>	<p style="text-align: right;">172</p> <p>1 photographs?</p> <p>2 A No, there wouldn't be. So it's literally</p> <p>3 been times where I've been sitting there with some</p> <p>4 time on my hands and I'm running a dryer either</p> <p>5 with loads or without loads and I'm using one of</p> <p>6 our restricted exhaust setups like the AHAM code --</p> <p>7 the AHAM code or something that's more restrictive</p> <p>8 than that. I even use flat blockages like caps to</p> <p>9 completely block it 100 percent, and I can't get it</p> <p>10 to work.</p> <p>11 Q Have you tried it on one dryer?</p> <p>12 A I've tried it on a couple different ones</p> <p>13 we have in our facility.</p> <p>14 Q And the ones that you have, are they</p> <p>15 dryers that you've gone out and purchased, or</p> <p>16 you've gotten them secondhand?</p> <p>17 A One was secondhand and one was brand new.</p> <p>18 Both were ball-hitches, I know for certain. We may</p> <p>19 have also tried it on the bulkhead dryer, but I'm</p> <p>20 not 100 percent sure that we've done that, but I</p> <p>21 know we've done a used ball-hitch dryer and a brand</p> <p>22 new ball-hitch dryer with the electronic controls.</p> <p>23 Q So on the bulkhead, were you trying to</p> <p>24 force the error, too, or you're not sure? I'm</p>
<p style="text-align: right;">171</p> <p>1 I've read, I've never had anyone tell me about an</p> <p>2 E8C error code or flashing error lights, and even</p> <p>3 on the electronic dryers that we have, some</p> <p>4 exemplar ones, some of the used ones that are</p> <p>5 operational, we've attempted to force that error</p> <p>6 code to be generated by blocking the exhaust and</p> <p>7 reducing the exhaust and blocking and unblocking</p> <p>8 the exhaust, and it's never been a recorded thing</p> <p>9 because we've, you know, just kind of been playing</p> <p>10 with it here and there and have never been able to</p> <p>11 get it to work right, not even close that we can</p> <p>12 get it to work right.</p> <p>13 So we've tested it, somewhat</p> <p>14 unofficially, but since we can't get it to</p> <p>15 activate, then there's no way to, like, document</p> <p>16 what parameters or try to fine-tune what parameters</p> <p>17 would -- should get it to operate.</p> <p>18 Q Okay.</p> <p>19 A So it may be an ineffective device, but</p> <p>20 until we get more discovery or something like that,</p> <p>21 we're kind of at a stumbling block where we can't</p> <p>22 do anything with it.</p> <p>23 Q So the unofficial testing, is there</p> <p>24 anything on the hard drive about it or, like,</p>	<p style="text-align: right;">173</p> <p>1 sorry. I missed what you said.</p> <p>2 A I can't remember if I specifically tested</p> <p>3 the bulkhead yet. I know I have to do more with</p> <p>4 that one, so I may have just started a little bit</p> <p>5 on it, but that was, like, a year and a half ago.</p> <p>6 Q Is the bulkhead -- is it your</p> <p>7 understanding the bulkhead is supposed to work the</p> <p>8 same way in terms of generating the E8C error code?</p> <p>9 A That's my understanding from the</p> <p>10 instructions, yes.</p> <p>11 Q Okay.</p> <p>12 A So the instructions are for the good and</p> <p>13 better models from 2005 until 2011 when the Webster</p> <p>14 City plant shut down, but it's also present in the</p> <p>15 bulkhead models as well, from my understanding.</p> <p>16 Q Do you have an opinion as to whether the</p> <p>17 Clouds' dryer was installed in accord with</p> <p>18 Electrolux's instructions?</p> <p>19 A Which version of the instructions are you</p> <p>20 talking about?</p> <p>21 Q The version of the instructions that</p> <p>22 accompany the subject dryer.</p> <p>23 A From my understanding in 2003, anyway,</p> <p>24 Electrolux did not recommend the use of flexible</p>

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<p>1 foil ducting at all, whether it be for a transition 2 duct or not, so technically in the black and white 3 sense, I would say no. 4 But I have to obviously bring up the fact 5 that the 2008 ball-hitch dryer installation 6 instructions which were for the same platform of 7 dryer allowed the use for it, so it's kind of an 8 inconsistency there, and Electrolux sold those 9 ducts. 10 Q Okay. If you could go back to page 173. 11 A Sure. 12 Q So you make a statement in the second 13 paragraph, second sentence, "Most importantly, the 14 insureds hired a professional installer and 15 retailer of Electrolux appliances to install the 16 dryer." Are you referring to Sears in that 17 sentence as the professional? 18 A Yes. That's what we were told in the 19 interview, that he got it from Sears, and then in 20 his deposition, he didn't seem quite as certain, 21 but he still kind of referred to that he bought 22 most of his appliances from Sears. 23 Q So apart from the information that was 24 communicated by Mr. Cloud, do you have any other</p>	<p>1 this is -- there's probably some overlap 2 of Dr. Vigilante and I here certainly, 3 but as far as the actual testimony of 4 Mrs. Cloud, she didn't really understand 5 what those instructions were certainly. 6 So I have to preface it by 7 saying that, but I would agree that the 8 interior of the dryer cabinet was not 9 cleaned every 18 months as far as that 10 specific instruction goes. 11 BY MS. YEMMA: 12 Q And how about the venting? 13 A Or the venting specifically. I mean, Mr. 14 Cloud testified to how often he cleaned the 15 venting, but it was not professionally cleaned, 16 which is what the instructions certainly call for, 17 so, you know, Mr. Cloud certainly said that he 18 cleaned the venting, but it was not professionally 19 cleaned. 20 Now, again, that's -- that instruction, 21 in my opinion, and my opinion again based on 22 experience and interviewing people and 23 understanding the specifics involved in these 24 clothes dryers, is, you know, it's not a very --</p>
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<p>1 evidence -- are you aware of any evidence to 2 support that Sears installed the dryer? 3 A You mean as far as, like, a receipt or 4 something? Yeah, we haven't been produced with any 5 receipts or specific sales documents. We're just 6 basing that on testimony. 7 Q Okay. Are you aware that Sears was 8 subpoenaed in this matter for records regarding the 9 Clouds' dryer? 10 A I may be. I don't recall the details. 11 Our attorneys may have told us that, but I just 12 don't remember. 13 Q Okay. But you don't recall seeing any 14 documents from Sears in response to that subpoena, 15 do you? 16 A No, not that I can recall. I think 17 everything I've seen in this case that's been 18 produced by defendant is just from Electrolux. 19 Q Okay. Do you have an opinion with regard 20 to whether the maintenance instructions provided by 21 Electrolux with the dryer were followed? 22 MR. HUGHES: Object to form. 23 THE WITNESS: I have -- sure, I 24 have opinions about that, and, again,</p>	<p>1 it's not clear. 2 There's a lot of people that seem to be 3 confused by the warning when I ask them questions 4 about what that specific warning says, because it 5 says that you should clean it, not that you must 6 clean it, and that's true of Electrolux's own 7 people. 8 Shelly Clausen who's the person in charge 9 of the manuals, she doesn't clean her dryer every 10 18 months, either, because she doesn't seem to have 11 a problem with her dryer. She says it's not a 12 requirement. It's a recommendation, and that's -- 13 that's substantially similar to a lot of people 14 I've interviewed. 15 Q And the people you interviewed, we had 16 already talked about this, but you're talking about 17 people that have already -- that have had fires? 18 A Well, yeah, as far as the cases go, but, 19 I mean, again, I've talked about this with people, 20 my own friends, family, people in random 21 conversation where without saying anything about 22 any particular brand of dryer, whatever, I would 23 say, "Hey, I'm just" -- "you know, we're on the 24 topic of this. I do this for work. Do you clean</p>

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<p style="text-align: right;">178</p> <p>1 your dryer? Do you have it professionally cleaned?</p> <p>2 Do you have someone come and take apart your</p> <p>3 appliance, even periodically?" And people are</p> <p>4 like, "No. What would I do that?"</p> <p>5 Q Has anyone ever replied yes?</p> <p>6 A Yes.</p> <p>7 Q How many people?</p> <p>8 A I couldn't say an exact number, but a</p> <p>9 relatively small amount, a lot fewer than most, but</p> <p>10 usually those people will say, "Well, yeah, I had a</p> <p>11 problem with my dryer. I had a broken belt or I</p> <p>12 had something else, so that's what made me have the</p> <p>13 need for a professional service," and that's</p> <p>14 certainly in line with the CPSC survey.</p> <p>15 Q You would agree Electrolux isn't the only</p> <p>16 dryer manufacturer that requires periodic</p> <p>17 maintenance and cleaning of the dryer cabinet?</p> <p>18 A Yeah, I would agree that they're not the</p> <p>19 only one. The UL standard requires that they put</p> <p>20 an instruction in the manual that says periodic</p> <p>21 maintenance.</p> <p>22 Now, there's even some other</p> <p>23 manufacturers that go further to define that to a</p> <p>24 time period as well, but only limited ones. LG and</p>	<p style="text-align: right;">180</p> <p>1 Q Okay.</p> <p>2 A Well, at least it depends on your</p> <p>3 definition to point of origin. I can narrow it</p> <p>4 down to a pretty small area.</p> <p>5 Q And what is that area?</p> <p>6 A The area between the gas burner and the</p> <p>7 back of the drum, and then even beyond that, the</p> <p>8 fire patterns on the lint in the heater pan</p> <p>9 indicate that it was most likely -- most probably</p> <p>10 it ignited at the interface between the heat duct</p> <p>11 and the heater panel.</p> <p>12 Q And it's your opinion that lint was the</p> <p>13 first material ignited?</p> <p>14 A Yes.</p> <p>15 Q Okay. And where -- do you know where</p> <p>16 that lint -- sorry. Go ahead.</p> <p>17 A You know what? This has always kind of</p> <p>18 bothered me, so I have to actually say this.</p> <p>19 Q Okay.</p> <p>20 A Because it's this obvious, but</p> <p>21 technically gas was the first material ignited.</p> <p>22 Q Okay.</p> <p>23 A Because it's a gas burner flame in this</p> <p>24 particular case.</p>
<p style="text-align: right;">179</p> <p>1 Samsung are the only other two that -- well, GE.</p> <p>2 GE, LG, and Samsung also define a time period.</p> <p>3 Q How do they define the time period?</p> <p>4 A It depends on the manufacturer. GE --</p> <p>5 well, the Electrolux GEs are 12 months even though</p> <p>6 the Electrolux everything else are 18 months; and</p> <p>7 it's either LG or Samsung is 24 months, and that</p> <p>8 seems to be a more recent trend.</p> <p>9 Q 24 months?</p> <p>10 A Well, yeah, that this other company is</p> <p>11 defining a time period. That seems to have only</p> <p>12 happened in the past, like, few years.</p> <p>13 Q Are you aware of any other companies that</p> <p>14 we haven't just talked about that define the</p> <p>15 period, that define periodic?</p> <p>16 A Not that I can think of off the top of my</p> <p>17 head. I know -- or at least the last time I</p> <p>18 reviewed recent manuals for, like, Whirlpool and</p> <p>19 Maytag, they weren't doing it. They were still</p> <p>20 saying periodic.</p> <p>21 Q Mike, were you able to come to a</p> <p>22 conclusion with regard to the point of origin for</p> <p>23 the fire?</p> <p>24 A Yes.</p>	<p style="text-align: right;">181</p> <p>1 Q We want to be precise, so --</p> <p>2 A We want to be precise, but that's</p> <p>3 expected, but after the gas, the lint.</p> <p>4 Q After the gas, the lint.</p> <p>5 Do you have an opinion as to where the</p> <p>6 lint came from that was ignited?</p> <p>7 A Sure. At least specifically as far as</p> <p>8 the burn, the lint that was the most heavily</p> <p>9 burned, that was right at the interface between the</p> <p>10 heater pan and the heat duct, right about the seven</p> <p>11 o'clock position on the heater pan.</p> <p>12 Q Can you estimate how -- what the size of</p> <p>13 the lint was that was first ignited after the gas?</p> <p>14 A Well, are you --</p> <p>15 MR. HUGHES: Object to form.</p> <p>16 THE WITNESS: Are you</p> <p>17 talking -- can you define the time</p> <p>18 period, I guess? Like, how quickly are</p> <p>19 you talking about here?</p> <p>20 MS. YEMMA: When it first</p> <p>21 ignites.</p> <p>22 THE WITNESS: I mean, it could</p> <p>23 be -- it could be multiple sizes. I</p> <p>24 guess I really can't answer that question</p>

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<p style="text-align: right;">182</p> <p>1 the way you asked.</p> <p>2 MS. YEMMA: Okay. I'm getting</p> <p>3 near the end.</p> <p>4 MR. HUGHES: That's usually the</p> <p>5 45-minute warning.</p> <p>6 MS. YEMMA: Not me, unless you</p> <p>7 say something that prompts me to ask,</p> <p>8 like, 25 follow-up questions.</p> <p>9 BY MS. YEMMA:</p> <p>10 Q Just out of curiosity, is there a reason</p> <p>11 why you include some of the testing in the appendix</p> <p>12 and leave some out?</p> <p>13 A Yeah, just because we kind of gave up on</p> <p>14 trying to produce it all at a point in time. We've</p> <p>15 got a drive of information that we rely upon.</p> <p>16 Some of the charts and whatever else, I</p> <p>17 guess we could probably take off there because the</p> <p>18 hard drive's been passed around so many times now</p> <p>19 that everyone pretty much has the information, so I</p> <p>20 will definitely consider that to make the planet a</p> <p>21 better place by saving some trees.</p> <p>22 MR. HUGHES: We all like</p> <p>23 oxygen.</p> <p>24 BY MS. YEMMA:</p>	<p style="text-align: right;">184</p> <p>1 A There was.</p> <p>2 Q And there was no -- that part of the</p> <p>3 dryer did not fail?</p> <p>4 A That's correct.</p> <p>5 Q Okay.</p> <p>6 A At least not to cause a fire.</p> <p>7 Q It wasn't the cause of the fire?</p> <p>8 And then similarly on page 100, you have</p> <p>9 a paragraph about heating element failures and</p> <p>10 foreign objects. There's no heating element in the</p> <p>11 gas dryer, right?</p> <p>12 A That's correct. Well, there is a heating</p> <p>13 element, but it's only to ignite the gas.</p> <p>14 Q There isn't an electric coil?</p> <p>15 A Yes. Well, that depends how you want to</p> <p>16 define coil.</p> <p>17 MS. YEMMA: He's not going to</p> <p>18 concede anything.</p> <p>19 MR. HUGHES: Just overall, it</p> <p>20 is a design defect case, and, you know,</p> <p>21 Mike's going to stay within the four</p> <p>22 corners of his report, but if it's in his</p> <p>23 report, to the extent that it's related</p> <p>24 to a criticism of the design of</p>
<p style="text-align: right;">183</p> <p>1 Q All right. So, Mike, if you could turn</p> <p>2 to -- it's a series of pages, so starting on page</p> <p>3 99. You talk about failures associated with</p> <p>4 electric Electrolux dryers.</p> <p>5 A Yes.</p> <p>6 Q And I just want to confirm. This case</p> <p>7 involves a gas dryer. No question, right?</p> <p>8 A Certainly.</p> <p>9 Q So at trial, you're not going to talk</p> <p>10 about, you know, a bearing failure. That didn't</p> <p>11 occur in this case?</p> <p>12 A I mean, it would obviously depend on what</p> <p>13 I'm limited to at trial and what the conversation</p> <p>14 goes like. I mean, I think certainly the reason</p> <p>15 why I put this in my report has to deal with</p> <p>16 Electrolux's overall design of the product and</p> <p>17 their failure to adequately conduct failure modes</p> <p>18 and effects analysis and make design changes, so</p> <p>19 that's why it's in my report, although I would</p> <p>20 expect that at the time of trial, I would be</p> <p>21 focusing on the gas stuff.</p> <p>22 Q Okay. So there was no -- there was a</p> <p>23 bearing in the Clouds' dryer, right, a bearing</p> <p>24 assembly?</p>	<p style="text-align: right;">185</p> <p>1 Electrolux's ball-hitch dryer, whether it</p> <p>2 be gas or electric, we intend to pursue</p> <p>3 that at trial.</p> <p>4 THE WITNESS: We'll deal with</p> <p>5 that at the time.</p> <p>6 MS. YEMMA: All right. Can you</p> <p>7 give me just a few minutes to run through</p> <p>8 my notes?</p> <p>9 THE WITNESS: Sure.</p> <p>10 MS. YEMMA: And then --</p> <p>11 MR. HUGHES: Do you think</p> <p>12 you're done with this hard drive?</p> <p>13 MS. YEMMA: Yeah.</p> <p>14 (At this time, a discussion was</p> <p>15 held off the record.)</p> <p>16 BY MS. YEMMA:</p> <p>17 Q Okay. So, Mike, during one of the</p> <p>18 breaks, we photocopied -- or Pat's staff</p> <p>19 photocopied some documents that were in I think a</p> <p>20 billing folder?</p> <p>21 A Yes.</p> <p>22 Q Is this all of the billing that you've</p> <p>23 generated for the Cloud matter so far?</p> <p>24 A Yes, to date, yeah, not including any</p>

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<p style="text-align: right;">186</p> <p>1 prep or anything for the deposition or travel or</p> <p>2 anything, but, yeah, up to, you know, recently.</p> <p>3 Q Okay.</p> <p>4 A In addition to the invoices that are</p> <p>5 there, there's diary sheets that indicate our time,</p> <p>6 what we specifically did, then any cover letters or</p> <p>7 reports that went along with those.</p> <p>8 Q You testified about this earlier when we</p> <p>9 were talking about how the dryer got to the Wright</p> <p>10 Group, and I'm looking at the evidence transmittal</p> <p>11 documentation, and I know it came from IEI</p> <p>12 Consulting. Do you know whether any engineers from</p> <p>13 IEI Consulting inspected the dryer?</p> <p>14 A I don't believe so.</p> <p>15 Q Do you know how they came into possession</p> <p>16 of the dryer?</p> <p>17 MR. HUGHES: I can answer that</p> <p>18 for you. Do you want it on or off the</p> <p>19 record? It's up to you.</p> <p>20 MS. YEMMA: Off the record is</p> <p>21 fine.</p> <p>22 (At this time, a discussion was</p> <p>23 held off the record.)</p> <p>24 (At this time, a document was</p>	<p style="text-align: right;">188</p> <p>1 number of the first one was EHP-Cloud 000266, and</p> <p>2 it was a DVR from 2000, and I just made an</p> <p>3 observation that it was a DVR regarding life</p> <p>4 testing for new parts, but there was no attached</p> <p>5 lab report, so we didn't know, you know, were there</p> <p>6 any observations.</p> <p>7 I did send out the dryer to be tested for</p> <p>8 ten or 20-year equivalency, but there would be no</p> <p>9 lab report to say if there was any accumulation of</p> <p>10 lint or fires or anything, a couple breakdowns,</p> <p>11 whatever they may be, so it looked like there may</p> <p>12 be some information missing.</p> <p>13 The other one starts at 000388. It's a</p> <p>14 DVR from 2001, and it discusses dryer performance</p> <p>15 enhancements. That involves the testing of a low</p> <p>16 permeability air duct seal and decreasing the space</p> <p>17 of the heater pan to the back of the drum and</p> <p>18 closing holes in the back of the drum, and it's</p> <p>19 just discussion of some of the testing they did.</p> <p>20 Obviously the document has whatever data it has in</p> <p>21 there.</p> <p>22 I did note that they tested the exhaust</p> <p>23 under a few different back pressures, 0.45 inches,</p> <p>24 the AHAM 0.75 inches, 0.90 inches, and 1.00 inches.</p>
<p style="text-align: right;">187</p> <p>1 marked for identification as Exhibit</p> <p>2 Stoddard-5.)</p> <p>3 BY MS. YEMMA:</p> <p>4 Q Mike, I'm going to hand you what's been</p> <p>5 marked as Stoddard-5, and this was another document</p> <p>6 that we photocopied from your file. Do you</p> <p>7 recognize the document?</p> <p>8 A I do. They're some of my notes.</p> <p>9 Q So just because I may have trouble</p> <p>10 reading your handwriting after the deposition --</p> <p>11 A Probably.</p> <p>12 Q -- do you mind just identifying the</p> <p>13 document?</p> <p>14 Well, it looks like this document was</p> <p>15 created from your review of documents in</p> <p>16 Electrolux's production; is that right?</p> <p>17 A That's correct, some DVRs or design</p> <p>18 verification requests.</p> <p>19 Q If you would just identify what DVR you</p> <p>20 reviewed, and then if you could read your notes</p> <p>21 into the record.</p> <p>22 A Yeah, I reviewed whatever DVRs were</p> <p>23 submitted. These are just a few comments I made on</p> <p>24 a couple specific documents. The Bates stamp</p>	<p style="text-align: right;">189</p> <p>1 Then it's -- I made that note that that</p> <p>2 shows the expectation that the dryer will be vented</p> <p>3 in back pressures over 0.75 inches of water column,</p> <p>4 and they also tested it with loads up to 22 pounds</p> <p>5 of towels.</p> <p>6 The third note was 000496. It was a DVR</p> <p>7 from 2002. It discussed a prototype to fabricate</p> <p>8 the cabinet and front panel for a large capacity</p> <p>9 dryer done by Mike Ricklefs, R-I-C-K-L-E-F-S,</p> <p>10 6/27/02, Project #02-0165, and this modified the</p> <p>11 dryer in a couple ways.</p> <p>12 One was to modify the base to accept a</p> <p>13 cartridge heater in the Maytag blower system. The</p> <p>14 cartridge heater would be relocating the dryer</p> <p>15 heating element in the case of an electric dryer,</p> <p>16 and then the front panel was modified to mate with</p> <p>17 the front bulkhead system, so I was just curious</p> <p>18 about that information.</p> <p>19 Q Mike, do you have any other notes</p> <p>20 regarding your review of Electrolux's document</p> <p>21 production other than what we just marked as</p> <p>22 Stoddard-5?</p> <p>23 A No, that's the only specific notes I</p> <p>24 probably made. Any other notes that I would have</p>

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<p style="text-align: right;">190</p> <p>1 made would have just been, like, on a Word document</p> <p>2 which would have been incorporated into the report</p> <p>3 and just deleted. That's our typical practice.</p> <p>4 If I have handwritten notes, I keep them,</p> <p>5 but generally if I'm just working on something,</p> <p>6 it's for the process of authoring a report, so I'll</p> <p>7 do it in a Word document and then incorporate it in</p> <p>8 and then get rid of the rest. Well, not get rid of</p> <p>9 the rest, but get rid of the original because I</p> <p>10 don't need it.</p> <p>11 Q Mike, going back to -- I just have a</p> <p>12 couple of follow-ups, so I think we'll be finished</p> <p>13 in not too much longer.</p> <p>14 So in 2003 when this dryer was</p> <p>15 manufactured, are you aware of any dryer</p> <p>16 manufacturers conducting fire containment testing</p> <p>17 other than the GE SEE test?</p> <p>18 A Yes, I'm aware of fire containment tests.</p> <p>19 Q Okay. So who -- what other dryer</p> <p>20 manufacturers were doing fire containment testing?</p> <p>21 A Whirlpool was. From my understanding in</p> <p>22 talking with their engineers, different instances</p> <p>23 they've been doing fire containment testing above</p> <p>24 and beyond the minimum standards since the mid or</p>	<p style="text-align: right;">192</p> <p>1 their fire containment for that test, but GE was</p> <p>2 also doing it prior to then when GE was making</p> <p>3 their own dryers, and, again, that goes back to the</p> <p>4 1980's sometime as well.</p> <p>5 Q And, Mike, I -- if I asked you this</p> <p>6 earlier, I apologize. If we can go back to the</p> <p>7 photographs, Stoddard-4, that are collectively</p> <p>8 marked as Stoddard-4, and I want to draw your</p> <p>9 attention to Photograph 421. Do you recognize</p> <p>10 what's depicted in that photograph?</p> <p>11 A Sure. It's a clump of lint and soot and</p> <p>12 cloth or paper or something like that.</p> <p>13 Q Okay. And that was what was taken out of</p> <p>14 the four-foot length of the rigid venting?</p> <p>15 A Can I --</p> <p>16 Q Sure.</p> <p>17 A This is the first joint exam. We</p> <p>18 purposely didn't, like --</p> <p>19 Q You can take those off.</p> <p>20 A -- strip out any lint or anything out of</p> <p>21 there. It's just kind of what fell out of that</p> <p>22 piece, and it's shown better on Image 419 and 420,</p> <p>23 that that mass that's depicted in 421 is just kind</p> <p>24 of loosely clumped in the ducting. We didn't,</p>
<p style="text-align: right;">191</p> <p>1 late 1980's.</p> <p>2 Q And is there -- was that a drum fire --</p> <p>3 drum fire containment, or base, or both, if you</p> <p>4 know?</p> <p>5 A I think that they were doing both, but I</p> <p>6 don't know if they started doing both. They may</p> <p>7 have started with one iteration and then added</p> <p>8 another one at a second period of time, but it's my</p> <p>9 understanding that they were doing some type of</p> <p>10 fire containment testing back into the '80's. I</p> <p>11 just don't know what was what.</p> <p>12 Q And do you know which one they started</p> <p>13 with?</p> <p>14 A I don't.</p> <p>15 Q You don't?</p> <p>16 A No. In talking with the Whirlpool</p> <p>17 people, it's my understanding that the push to add</p> <p>18 in fire containment was partly due to Whirlpool.</p> <p>19 Q So apart from Whirlpool, are you aware of</p> <p>20 any other dryer manufacturers doing fire</p> <p>21 containment in 2003 or earlier?</p> <p>22 A I don't know if they were or were not. I</p> <p>23 mean, GE obviously. We talked about the GE SEE</p> <p>24 test. You know, Electrolux was obviously doing</p>	<p style="text-align: right;">193</p> <p>1 like, pull it out of there. It just was loose.</p> <p>2 Q Okay. Like fluffy lint.</p> <p>3 MS. YEMMA: Okay. I don't have</p> <p>4 anything further. We're all done. You</p> <p>5 don't have any questions, right?</p> <p>6 MR. HUGHES: Nope.</p> <p>7 (Witness excused.)</p> <p>8 (Deposition concluded at 4:34</p> <p>9 p.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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194	<p>1 CERTIFICATION</p> <p>2</p> <p>3</p> <p>4 I, DANIELLE N. COUGHLIN, Registered</p> <p>5 Professional Reporter and Notary Public, do hereby</p> <p>6 certify that the foregoing is a true and accurate</p> <p>7 transcript of the stenographic notes taken by me in</p> <p>8 the aforesaid matter.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18 DATE: 4/30/16</p> <p>19</p> <p>20 _____</p> <p>21 DANIELLE N. COUGHLIN, RPR</p> <p>22</p> <p>23</p> <p>24</p>	196	<p>1 -----</p> <p>2 ERRATA</p> <p>3 -----</p> <table border="1"> <thead> <tr> <th>4 PAGE</th> <th>LINE</th> <th>CHANGE</th> </tr> </thead> <tbody> <tr><td>5 -----</td><td>---</td><td>-----</td></tr> <tr><td>6 -----</td><td>---</td><td>-----</td></tr> <tr><td>7 -----</td><td>---</td><td>-----</td></tr> <tr><td>8 -----</td><td>---</td><td>-----</td></tr> <tr><td>9 -----</td><td>---</td><td>-----</td></tr> <tr><td>10 -----</td><td>---</td><td>-----</td></tr> <tr><td>11 -----</td><td>---</td><td>-----</td></tr> <tr><td>12 -----</td><td>---</td><td>-----</td></tr> <tr><td>13 -----</td><td>---</td><td>-----</td></tr> <tr><td>14 -----</td><td>---</td><td>-----</td></tr> <tr><td>15 -----</td><td>---</td><td>-----</td></tr> <tr><td>16 -----</td><td>---</td><td>-----</td></tr> <tr><td>17 -----</td><td>---</td><td>-----</td></tr> <tr><td>18 -----</td><td>---</td><td>-----</td></tr> <tr><td>19 -----</td><td>---</td><td>-----</td></tr> <tr><td>20 -----</td><td>---</td><td>-----</td></tr> <tr><td>21 -----</td><td>---</td><td>-----</td></tr> <tr><td>22 -----</td><td>---</td><td>-----</td></tr> <tr><td>23 -----</td><td>---</td><td>-----</td></tr> <tr><td>24 -----</td><td>---</td><td>-----</td></tr> </tbody> </table>	4 PAGE	LINE	CHANGE	5 -----	---	-----	6 -----	---	-----	7 -----	---	-----	8 -----	---	-----	9 -----	---	-----	10 -----	---	-----	11 -----	---	-----	12 -----	---	-----	13 -----	---	-----	14 -----	---	-----	15 -----	---	-----	16 -----	---	-----	17 -----	---	-----	18 -----	---	-----	19 -----	---	-----	20 -----	---	-----	21 -----	---	-----	22 -----	---	-----	23 -----	---	-----	24 -----	---	-----
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195	<p>1 INSTRUCTIONS TO WITNESS</p> <p>2 Please read your deposition over</p> <p>3 carefully and make any necessary corrections. You</p> <p>4 should state the reason in the appropriate space on</p> <p>5 the errata sheet for any corrections that are made.</p> <p>6 After doing so, please sign the errata</p> <p>7 sheet and date it. You are signing same subject to</p> <p>8 the changes you have noted on the errata sheet,</p> <p>9 which will be attached to your deposition.</p> <p>10 It is imperative that you return the</p> <p>11 original errata sheet to the deposing attorney</p> <p>12 within thirty (30) days of receipt of the</p> <p>13 deposition transcript by you. If you fail to do</p> <p>14 so, the deposition transcript may be deemed to be</p> <p>15 accurate and may be used in court.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	197	<p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, _____, do hereby</p> <p>3 certify that I have read the foregoing pages ___</p> <p>4 to ___ and that the same is a correct</p> <p>5 transcription of the answers given by me to the</p> <p>6 questioning therein propounded, except for the</p> <p>7 corrections or changes in form or substance, in</p> <p>8 any, noted in the attached Errata Sheet.</p> <p>9 -----</p> <table border="1"> <thead> <tr> <th>10 DATE</th> <th>SIGNATURE</th> </tr> </thead> <tbody> <tr><td>11</td><td></td></tr> <tr><td>12</td><td>Subscribed and sworn to before me this ____ </td></tr> <tr><td>13</td><td>day of _____, 200_.</td></tr> <tr><td>14</td><td>My commission expires: _____</td></tr> <tr><td>15</td><td></td></tr> <tr><td>16</td><td></td></tr> <tr><td>17</td><td>-----</td></tr> <tr><td>18</td><td>Notary Public</td></tr> <tr><td>19</td><td></td></tr> <tr><td>20</td><td></td></tr> <tr><td>21</td><td></td></tr> <tr><td>22</td><td></td></tr> <tr><td>23</td><td></td></tr> <tr><td>24</td><td></td></tr> </tbody> </table>	10 DATE	SIGNATURE	11		12	Subscribed and sworn to before me this ____	13	day of _____, 200_.	14	My commission expires: _____	15		16		17	-----	18	Notary Public	19		20		21		22		23		24																																		
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